

70: SEPA Center
Department of Natural Resources
P.O. Box 47015
Olympia, WA 98504

Re: Lake Whatcom Landscape Plan DEIS

I appreciate your seeking comments from citizens on DNR's plan on the Direct Environmental Impact Statement concerning the land around Lake Whatcom.

As well as drinking the water from Lake Whatcom I live a half mile from it. I consider it one of Whatcom County's greatest treasures. It is used and enjoyed by many and is a thing of beauty! I care deeply about our wonderful lake.

I worries me that logging is even being considered on the slopes near the lake, many of which are potentially unstable, on lands that are part of the Lake Whatcom watershed. This including the building of roads to achieve access to the areas being logged, can result in destructive landslides. It also is of concern to me that these activities can lead to an increase of sediment entering the lake.

I've studied the report and have talked to others in the "know".

I emphatically implore that the DNR do no logging on unstable slopes, do no oil drilling and agrees to a strong inter-jurisdictional committee, hopefully with independent scientists on it.

Thank you for reading my letter and I look forward to seeing these changes in the landscape plan's final draft.

(please turn over)

Sincerely yours,

Michael A Hinkel

Michael A Hinkel

3838 Idaho St

Bellingham, Wa

98229

RECEIVED

SEP 29 2003

ASSET MANAGEMENT
& PROTECTION DIVISION

To: SEPA Center
Dept. of Natural Resources
PO Box 47015
Olympia, WA 98504-7015

Re: Lake Whatcom Drinking Water Landscape Plan DEIS

First, I would like you to change the name of the official EIS process plan to "The State of Washington's Budget ~~Deficit~~ Deficit DEIS Preferred Alternative. You can shorten it if you would like but just as long as you keep the message clear.

I ask you keep the priority of the state's costs in check since this plan will cost the state more money in ~~the~~ trying to pass this plan. If you fail to realize that this Lake is a municipal drinking water ~~is~~ source you may as well as plan on legal action against the state. Make sure you let all ~~the~~ the state legislators inform their constituents as soon as possible

I ask that you make sure that the No Action Plan is implemented. Otherwise you will impose another fixed cost to our county and watershed residents that will ~~other~~ ^{other} ~~sales~~ ^{sales}

tip the scale of an already unbalanced
socioeconomic environment.

Sincerely,

David Nock

PO B 4113

Old Fairhaven, WA 98227

RECEIVED

SEP 29 2003

ASSET MANAGEMENT
& PROTECTION DIVISION

Thurs ~~Sept~~ 25th, 2003

To Whom it may concern,

I went to the talk regarding Lake Whatcom and lands that DNR is responsible for. Although this has been a long process, it seems there is still work to do.

First in my mind is that there is still too much emphasis placed on logging. I recognize that there will be forestry in this area, for generations to come, it is still at too high of level of harvesting. There are critical watershed issues, specifically the protection of drinking water from Lake Whatcom. There is also a good deal of wild life, and great recreation potential. I would like to see a small percentage of logging revenue to go to independent monitoring of roads & setbacks.

I do like the proposed idea of logging roads being open for a much shorter time than the current practice of fifteen years.

Is four years enough? It could place more pressure on larger harvest because of shorter time allowed for road construction etc.

Please create an inter-jurisdictional Committee.

Sincerely,

Roger Hull, *R. Hull*

215 W Holly St #241
Bellingham WA 98225

Sept 24, 2003

SEPA Center
DNR
Olympia, WA

Re: Lake Whatcom DEIS (#02-091300)

Dear DNR staff,

Thank you for taking public comment on the Whatcom Lake Landscape plan. I would like to comment on several aspects of the Preferred Alternative.

First, I am concerned about the impacts of road building, maintenance, and abandonment. Recent research by Cederholm and others has shown that roads are a large source of sediment flow to forested streams. While mass wasting is a significant issue, logging roads are a longer term concern. I think the landscape plan should more thoroughly address the plan to abandon and restore roads according to the latest ecosystem science (not only engineering-based measures).

OVER→

Second, please provide to the public a copy of the actual logging plan. At the public meeting on Sept. 22nd, it was mentioned that most of the logging will be occurring within the first decades. This front-loading strategy is not reflected in the DEIS; therefore the public cannot completely understand DNR's plan for timber removal.

Third, environmental monitoring is an important issue. All streams should be monitored for temperature and sediment, with the intention of monitoring potential phosphorous inputs to Lake Whatcom and other water quality issues.

Fourth, I am concerned about activities on potentially unstable slopes, especially logging. Present science indicates that logging on unstable slopes can lead to landslides. I support the idea of formation of an interjurisdictional committee, paid for by logging revenues not general funds. This committee should oversee all action on DNR lands in the watershed, with the ability to stop or modify activities.

Thank you for recording and considering my comments.

Sincerely,
Barbara Christensen
duiker22@hotmail.com

To: SEPA
Department of Natural Resources
P.O. Box 47015
Olympia, wa 98504-7015

I Live in Glenhaven on Reed Lake directly below Lookout Mountain. The one thing that attracts Washington residents is the natural beauty of the surrounding landscape. I enjoy seeing the Bald eagles and Herring, Ospreys, and deer that inhabit the area. What will Glenhaven be like if Lookout Mountain is logged. Only twenty years ago in 1983 Landslides demolished the community. As you well know there is no insurance that covers natural disasters. If our homes are destroyed by Landslides where will we live. If our well is fouled who will pay for it, we will. Seeing as the view from my home looks directly at Lookout Mountain, its value will plummet, However, I know that our property taxes never will. If Lookout Mountain is logged a entire community will pay the price, just for a few dollars gained by the state.

No one will want to move here
and pay property taxes. People will
go Bankrupt, become homeless, and that
will cost Washington state as much
or more than it will earn from logging
Lookout Mountain. I am positive that
there will be devastating repercussions if
the Logging on Lookout Mountain continues.
Please don't log Lookout Mountain.

Melissa Hansen
419 Lakeside Drive
Sedro Woolley, WA 98284

RECEIVED

SEP 30 2003

ASSET MANAGEMENT
& PROTECTION DIVISION

2288 42483

Bellevue, WA
98229
Sept 25, 2003

SEPA Letter

Dept of Natural Resources

P.O. Box 47015

Olympia, WA 98504-7015

I appreciate the opportunity to comment on the management plan for DNR lands around Lake Wabatom.

Since we all think the water from Lake Wabatom, it is important that it be of the highest quality. I hope that you will make structural change to your preferred alternative.

Your staff have stated that they intend that lake be considerably more logging in the future decades, yet I do not see that in the DEIS. Please include that in the DEIS.

I am also concerned about logging on suitable slopes, where sediment can slide down down

into the lake. There needs to be an independent and interdisciplinary committee to oversee all the DNR lands in the entire watershed. This committee must have the authority to stop or modify activities. Funding for this committee is not a small sum. out of logging revenue, not from local governments.

I think also that there ought to be monitoring of all streams for sediment and temperature. There are already problems with dissolved oxygen and phosphorus.

Hope to see these changes in the final DEIS.

RECEIVED Yours truly,

SEP 30 2003

David B. Fenn

ASSET MANAGEMENT
& PROTECTION DIVISION

9-25-03

Mr. Bruce Kraig
1904 18th St. Apt. B303
Bellingham, WA 98225

(360) 647-0163

To the DNR:

Leave our Lake Whatcom
watershed alone. No logging.

No roads. No development.

It has already been
disturbed by humans too much.

70,000 people depend on it
for clean water. What

else do you need to know.

We humans should have
quit messing up this
watershed years ago.

Time to stop messing it
up now.

Sincerely,
Bruce Kraig

SEPA CENTER

SEPT. 25, 2003

DEPT. OF NATURAL RESOURCES

P.O. BOX 47015

SUBJECT: FILE # 02-091300

LAKE WHATCOM LANDSCAPE PLAN DEIS.

IN RESPONSE TO YOUR SEPT. 8, 2003 ^{MEMO} REGARDING
RECEPTION OF COMMENTS ON YOUR "DEIS"
FOR LAKE WHATCOM, I HAVE THE FOLLOWING
COMMENTS AND CONCERNS OR QUESTIONS.

1. WHAT IS THE ACTUAL LOGGING PLAN.
AT THE RECON WORKSHOP YOUR STAFF
STATED THEY INTEND TO LOG MORE
IN THE FIRST TWO DECADES. THIS IS NOT
IN THE DEIS.
2. PLEASE DETAIL YOUR TRUE MANAGEMENT
PLAN AND HOW YOU EVALUATE THE ACTUAL
ENVIRONMENTAL IMPACTS OF THAT PLAN TO THE
WATERSHED RATHER THAN THE 200 YEAR
AVERAGE
3. IN THE "DEIS" ON PAGE 106, IT IS
STATED THAT THERE WILL BE NO HARVEST
ON UNSTABLE SLOPES. BUT THE PROPOSED
ALTERNATIVE ALLOWS LOGGING ON AREA #1
UNSTABLE SLOPES. PLEASE DO NOT HARVEST

ON ANY UNSTABLE SLOPES IN THE
LAKE WHATCOM WATERSHED.

4. IN ADDITION, DNR SHOULD AGREE
TO AN INTERJURISDICTIONAL COMMITTEE
WITH INDEPENDENT SCIENTISTS WHO HAVE
THE AUTHORITY TO STOP RISKY ACTIVITIES
ON POTENTIALLY UNSTABLE SLOPES. THIS
COMMITTEE SHOULD BE FUNDED BY REVENUES
FROM LOGGING AND NOT BY LOCAL GOVERNMENTS.

5. THE ALLOWED OIL AND GAS EXPLORATION
IN THE LAKE WHATCOM WATERSHED SHOULD
BE DELETED AND A STATEMENT ADDED THAT
NO SUCH EXPLORATION OR DIAGONAL
DRILLING BE ALLOWED

6. THE DNR SHOULD MONITOR THE
IMPACT OF THEIR ACTIVITIES TO
SEDIMENT IN THE STREAMS AROUND LAKE
WHATCOM

I LOOK FORWARD TO SEEING THESE
CHANGES IN THE FINAL DRAFT OF
THE LANDSCAPE PLAN.

SINCERELY

James E. Cates

JAMES E. CATES

135 SUMNER VALLEY, BIRKEN 98229 4802

To: SEPA Center
Dept of Natural Resources
PO Box 47015
Olympia Wa. 98504

Re: Lake Whatcom Landscape Plan DEIS.

Please accept my comments on the DEIS for the DNR property in the Lake Whatcom watershed. I am very concerned about the environmental effects of logging in the watershed that provides drinking water for a majority of the residents of Whatcom County.

I would like to see the logging in the preferred alternative to be spread out over the 200 year duration of the plan instead of logging heavily during the first years of the plan.

Make sure that no logging occurs on unstable slopes. When logging does happen, make sure that silt does not reach water bodies.

I am very disappointed that the plan allows gas and oil exploration! This activity should not be allowed in the watershed of a drinking water source.

There should be a scientific committee to evaluate the effect of logging with the authority to stop risky activities.

The DNR should monitor and record the effects of all activities on the land in the watershed.

In closing, I would like the DNR to be acutely aware that the effects of activities on DNR land go beyond the property lines. This watershed is used by many people for many purposes.

The highest priority use must be the drinking water supply that Lake Whatcom provides for people in and around Bellingham.

Thank you for reading these comments.

Keith Fredrickson

7516 Wheeler Rd
Maple Falls, Wa.
98266.

RECEIVED

SEP 30 2003

LAND MANAGEMENT
DIVISION

To: Sec Center
Department of Natural Resources
PO Box 47015
Olympia, WA 98504-7015

Re: Lake Whatcom Landscape Plan
DEIS

It is a valuable thing to be able to voice my opinion. The only hopeful thought in my mind is that this discussion is taken seriously. It is a concern to me that the environmental impact statement is so vague. Any further discussion should include detail on such things as: management plans, logging allowances, sediment measurement, etc. On the subject of land management, one needs to take into account the present, past, and the future. Analysis on a 200 year measurement is seemingly inaccurate.

On a local level, Whatcom watershed is the only drinking resource for this town/city. It is bad enough that we are allowed to live near the it. Relatively uncontrolled logging is incredibly unrealistic. ~~which~~ This brings me to the subject of sediment measurement. Increased measurement is a must. Sediment in any large amount can inhibit the quality of our drinking water as well as choke the machine ~~the~~. The compounding of the sediment, year after year, would increase health problem for humans + animals alike.

Eventually we would need to filter the sediment (as we already do probably), and filtering would be more costly.

Logging allowances should be more strict. The increased leniency since President Bush began his term has made no sense. Increased logging is completely inefficient. It was not something that the people in the area asked for and it isn't what we want now.

Oil and gas drilling will definitely not be tolerated by the people or the wildlife. Landslides should be avoided. The measured slope stability needs to be determined before logging.

I ask that the late what can landscape plan be renewed and include more detail on such topics as: Slope angle measurement (for landslides), more detailed management planning, a lowering of logging allowances, and the definite inclusion of public opinion.

Thank you:
 Ted Le
 Asbury Land

The Honorable Doug Sutherland
Commissioner of Public Lands
Department of Natural Resources

Bellingham, Washington
September 29, 2003

Dear Commissioner Sutherland;

I am writing concerning the DEIS -
Lake Whatcom Landscape Plan. I believe that
there are some impacts that were inadequately
addressed that could be better mitigated than
planned in the preferred alternative.

The preferred alternative "dedicates 75 percent
of the land's productive capacity for ecological
and social benefits . . ." This amount appears to
strike a good balance compared to the other
alternatives. However, since this is a critical
watershed, the ecological system should be of
prime consideration. The social benefits (income)
should be incidental. Similarly, Objective 18
for the preferred alternative indicates that
a strategy should be to "maintain long term
public ownership of Forest lands". If the
purpose would be to protect this watershed
with revenue generation remaining incidental,
the strategy should be to increase and

Consolidate long term public ownership of forest lands for optimum management and watershed protection.

The DEIS discusses "prohibiting road construction on unstable slopes, carefully regulating harvest and road construction on potentially unstable slopes and providing inter-jurisdictional review of site specific activities. IT also says on page 121 that "The road system requirements ... would have cumulative benefits to the environment..." and more funds would be required on road related work. Since much of the area ~~is~~ could be "potentially unstable" as demonstrated by past slides and floods, it is unclear what carefully regulating harvest and road construction means or how this will be done. IT is inconceivable how the road building requirements (43 miles of new road) could be beneficial to a watershed system. The Legislative act creating the need for this Landscape Management Plan requires the department to manage certain zones "to protect water quality and riparian habitat." Such management should apply to the entire area as it is an ecological watershed.

Road construction especially should be reviewed on a site specific basis for any new construction being considered. The state Department of Health categorized Transportation and Timber management as activities with the highest potential to adversely impact water quality.

Finally, The assumptions under stream protection and slope stability and mass wasting could be refined. The permanent network of roads planned is 35 miles. However currently there are 44 miles of active roads with 43 more miles to be built. $44 + 43 = 87$ miles of road minus 42 orphaned equals 45 left?!

Why not utilize the existing system in a better way thereby reducing the large number of new road miles to be built. It does not make sense to build so much road for a smaller network. Also by eliminating the cost of some road construction, costs could be shifted to support balloon logging or helicopter logging instead of road building. Even though it is alleged that road construction can be averaged to a low amount annually, the practical fact is that much of it will be built in longer sections resulting in more potential adverse impact on the watershed.

4

Thank you for the opportunity to comment
on this plan.

Sincerely,

Ralph J. Warming

Ralph J. Warming



Working Together for Lake Whatcom

Mark Asmundson, Mayor
City of Bellingham
210 Lottie Street
Bellingham, WA 98225
(360) 676-6979

Pete Kremen, Executive
Whatcom County
County Courthouse
Bellingham, WA 98225
(360) 676-6717

Jim Neher, Director
Whatcom County Water District #10
1010 Lakeview Street
Bellingham, WA 98229
(360) 734-9224

Lake Whatcom Forestry Advisory Forum

September 30, 2003

Pete Kremen, County Executive
Lake Whatcom Management Comm.
Whatcom County Courthouse
311 Grand Avenue, Suite 108
Bellingham, Washington 98225

Mark Asmundson, Bellingham Mayor
Lake Whatcom Management Comm.
Bellingham City Hall
210 Lottie Street
Bellingham, Washington 98225

Jim Neher, Water District #10 Director
Lake Whatcom Management Comm.
Water District #10
1010 Lakeview Street
Bellingham, Washington 98229

Dear Committee Members:

The Forestry Advisory Forum has reviewed the State Department of Natural Resources (DNR) Draft Environmental Impact Statement issued September 8, 2003 for the Lake Whatcom Landscape Plan. The Forum supports the preferred alternative of the plan, with three recommendations:

- Although conifers are preferable for protecting the watershed, the DNR should consider managing hardwood stands for economic and bio-diversity reasons. (Objective 12)
- The Interjurisdictional Committee responsible for reviewing and making recommendations on site-specific activities should have the ability to call a public hearing when:
 - 1) A specific number of committee members (to be determined by committee bylaws) or more determines public input is necessary, or
 - 2) The Lake Whatcom Management Committee requests a public hearing before a decision is rendered to address issues brought before it.
- Most importantly, Forestry Advisory Forum members feel very strongly that the Forestry Advisory Forum serves as the Interjurisdictional Committee mandated by ESSB 6731. The Forestry Forum is willing to change its membership and format to assume that role.

For many years, the Forestry Advisory Forum has been successfully engaging in the tasks now assigned to the Interjurisdictional Committee. The Forestry Forum process is inclusive of a broad range of community members. In fact, many have said that the Forestry Advisory Forum is more inclusive even than the current Landscape Planning Committee. Because of this inclusiveness, it is also a process by which these same community members - neighborhood, environmental, forest practice, and government interests alike - have come to know and trust. There is no need for the DNR to duplicate our efforts.

Other concerns of certain Forestry Advisory Forum members include the funding for the Interjurisdictional Committee being shared between the Lake Whatcom Management Committee and the Trust Lands Division of the DNR; a more extensive consideration of the economic and social impacts beyond benefit to the Trust, such as lost jobs and recreation, and; the potential for consideration of opinion from technical experts outside the DNR.

The Forestry Advisory Forum requests that the Lake Whatcom Management Committee review and submit the Forum's concerns and recommendations to the DNR and the Board of Natural Resources by the public comment deadline of October 8, 2003. The Forum would like the DNR and the Board to consider its comments for inclusion in the Final Environmental Impact Statement.

Respectfully,



L. Ward Nelson, Chair
Lake Whatcom Forestry Advisory Forum

c: Bill Wallace, DNR Northwest Region Manager
Board of Natural Resources

October 2, 2003

SEPA Center
Washington State Department of Natural Resources
PO Box 47015
Olympia, WA 98504-7015

I live in Sudden Valley in the Lake Whatcom Watershed. I am very concerned that your Lake Whatcom Landscape Plan fails to do the very best to protect our water supply. I am also alarmed that this plan does not place the safety of those of us who live in the watershed way on the tip top of your list of priorities.

Here are a number of changes that I would like to see made to the Lake Whatcom Landscape Plan DEIS.

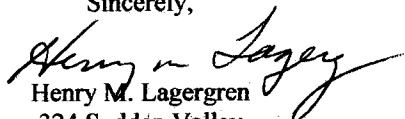
I would like you to write into the DEIS that there not be oil or gas exploration of any kind in the Lake Whatcom watershed. We don't need any oil in our water. We don't need increased sediments in our streams from additional disturbances to the soil from additional road building and construction of drilling pads and the like.

Would you please put in writing just how much acreage will be logged during different phases of the 200 years of the Landscape Plan? Are you going to log 90 percent of it in the first 5 years and then take the next 195 years to log the remainder? Will it be the opposite of this? Maybe it will be somewhere in between? The financial plan in the DEIS shows that you expect around 70 percent increased logging revenues for the first 20 years. Is that percentage increase indicative of a similar huge increase in acreage logged during same period? If so that figure is alarming! The cumulative negative environmental impacts of that much logging in so few years would be much greater than the watershed could absorb and still remain healthy. In your new evaluation please clearly and honestly state the environmental impacts of this dramatically increased activity.

I am concerned about your plan to continue to harvest on unstable slopes. The purpose of this plan and associated state legislation, which required a landscape plan in this watershed, was to improve water quality. It appears you have missed the point of that legislative directive. Sedimentation in streams caused by poor road building practices and logging on unstable slopes makes its way into the lake. This same sedimentation builds up in streams and degrades stream habitat for fish. Stream monitoring for sedimentation are strongly indicated here. As this plan progresses through its lifetime, streams should be monitored for sedimentation and if the sedimentation increases, logging practices should change to minimize those impacts. Don't harvest on unstable slopes to avoid these negative environmental impacts.

Harvesting in unstable slopes also puts those who live below them at risk. It is not enough to simply give lip service to our concerns for safety in our homes. I have seen the result of poor logging practices on DNR and private land where you have approved the cutting and road building plans. It appears the State Department of Natural Resources does not hold high the best interests of our citizens when it comes to forest practices. We deserve much better. Please agree to an inter-jurisdictional committee with independent scientists who have the authority to stop these risky activities on unstable slopes.

Sincerely,


Henry M. Lagergren
324 Sudden Valley
Bellingham, WA 98229

SEPA Center
Dept Natural Resources
PO Box 47015
Olympia, WA 98504-7015

Re: Lake Whatcom Landscape Plan DEIS

Your seeking comment on the management plan for DNR lands around Lake Whatcom is appreciated. Since I drink my water from the Lake Whatcom reservoir, I feel I should write a letter for myself and the others who use the water.

I was interested in your preferred alternative plan, but feel unsure about some aspects. I understand more about averages on clearcut planning, but it seems 75 acres per year for 20 years is too large an initial amount. "Potentially" unstable slopes are a concern. We need a strong interjurisdictional committee with some authority to mediate and change plans if considered a concern. This committee should be made up of a variety of expertise with a fair complement of citizens with serious concerns.

Possibly the word "monitoring" is very important. This should occur on all aspects, to keep to the plan.

It does seem really that the solution to

all the concerns would be to work for another way to get money for the state school needs. This I realize is a legislative problem, and for now you, the DNR, are mandated to cut timber for this need.

Thank you for listening - I hope you can move a bit toward further protection of our ^{lake} what can watershed -

Jo Anne Feringer
799 Chuckanut Shore
Bellingham WA
98229

RECEIVED

OCT 06 2003

ASSET MANAGEMENT
SECTION DIVISION

Chama Archimede

2996 Clipper Rd
Deming WA 98244-9117

To Whom it may concern:

Clean, high quality drinking water is something we all desire and deserve. And something we are all smart enough to know how to attain & maintain.

In deciding how to manage the DNR lands in the Lake Whatcom watershed, I urge the DNR to make the best possible choice to protect the drinking water for 85,000 people, & to also realize that Lake Whatcom's H₂O needs to accommodate the water requirements for inevitable future population growth.

It is a huge responsibility. I feel the less disturbance through logging + clearing around the Lake's lands, the better the chances are to protect the water supply + lake ecosystem. It requires more than just prohibiting logging on unstable slopes. Intact forests help to balance + regulate water flows naturally. Undisturbed forests are valuable in + of themselves.

Please take this opportunity to act in the highest interest + highest good for both the people of Bellingham and the forest ecosystem. This is your chance to set an admirable standard for the area. The water supplies of other national municipalities are highly prized and vigorously protected. Lake Whatcom needs that same attention + dedication.

Thank you very much for your sincere concern. Good luck!

Warmly,

Chama Archimede

SEPA Center
DNR

Oct 1 2003

I'd like to make some comments on the Lake Whatcom
landscape plan DEIS.

I am concerned about the land around our watersupply
in the lake. I would like you to provide the citizens
of Whatcom County with your actual logging plan.

I am concerned with potentially dangerous harvesting
on unstable slopes. I ask you support the formation
of an interjurisdictional Committee that oversees all
actions on DNR lands in our watershed & that has
the ability to stop or modify activities - Funding should
be from forest revenues. I appreciate your understanding
my concerns -

Sincerely,

 Ullman

718 Donovan Ave.

Bellingham WA 98225

SEPA Center

D.N.R.

P.O. Box 47015

Olympia, WA 98504-2015

RE: Lake Whatcom, Landscape Plan DEIS

I chair the City of Bellingham Watershed Advisory Committee. I live in the watershed at 2620 Shepardson St., 98226.

I ask that you monitor all streams for temperature and sediment. At the workshop DNR staff said they intend to do more logging in the first 20 years. I do not find that in the DEIS. Please include it.

I am concerned about logging on unstable slopes. Reports say they contribute to landslides.

Lastly, there needs to be an Interjurisdictional Committee appointed that oversees all actions of the D.N.R. in and on our watershed. This committee should be funded from logging proceeds.

Sincerely,

Stan Snapp, Chair, Watershed Advisory Committee
City of Bellingham

Date: October 1, 2003

To: SEPA Center

Re: Lake Whatcom Landscape Plan DEIS

Thanks for your willingness to incorporate citizens in the plan for the management of DNR lands surrounding Lake Whatcom.

I am a citizen of Whatcom county, drink out of the lake, and have numerous concerns about the conditions of the Watershed. However, I will limit those to the subject mentioned above.

First off, I am dissapointed that the plan to log significantly more in the first two decades was not overtly stated at the workshop on the Lake Whatcom DEIS. Please change that oversight.

Secondly, the seriousness of harvesting on unstable slopes, I don't believe has been properly addressed. I would like to see that DNR not log on these slopes. It is my strong belief that the drawbacks significantly outweigh the benefits.

Another point that I would like to emphasize, which should be an obvious point for all major projects, is the continuance of mandatory

monitoring of all streams for impact resulting from the logging (and associated activities).

It goes without saying that you should not allow ~~a~~ oil or gas exploration in the watershed. There other areas which are not close to the watershed.

In closing, I think with a little imagination these issues could be resolved by looking at alternatives to what all of us see as the way things go in this world. Please take the time to plan for our future generations!

Again I appreciate your efforts.

Most Sincerely,



Dieter Brandyberry
505 N Garden Street #3D
Bellingham, WA 98225

10-1-2003

Re: Lake Whatcom Landscape
Plan DEIS

To whom it may concern:
I am a new resident and
homeowner in Bellingham, WA.
In looking at long-range plans
for the Lake Whatcom area, I
am understandably concerned
about water quality.

As usual with resource
extraction issues I feel that
our government land management
agencies don't go far enough
in watershed protection. Specifi-
cally I don't believe that any
clearcutting activity is warranted.
Logging on unstable slopes is also
a significant concern. Stream
quality should not be compro-
mised for short-term economic
benefit.

Please consider alternative
plans that are more sensitive
①

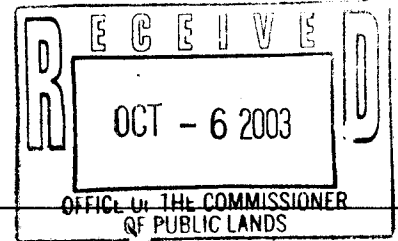
to environmental conservation.
Additionally, harvesting of timber
should consider climate change
issues and long range water needs.

Our public lands and
forests should not be commod-
ified to the detriment of Public
Health and safety. Protecting
our water supply is of paramount
importance.

Thank you for your consid-
eration of my concerns.

Sincerely,
Kent Heuer

3122 Laurelwood Ave.
Bellingham, WA 98225



October 2, 2003

Ref: SEPA File No. 02-091300

Mr. Doug Sutherland
State Commissioner of Public Lands
1111 Washington Street, S.E.
Olympia, WA 98504-7015

**Subject: Sudden Valley Community Association Board Of Directors Comments
Regarding: DNR DRAFT ENVIRONMENTAL IMPACT STATEMENT
(DEIS) FOR THE LAKE WHATCOM LANDSCAPE PLAN**

Mr. Sutherland:

The Sudden Valley Community Association Board of Directors would like to take this opportunity to comment on the Lake Whatcom DEIS. We understand and appreciate the fiduciary responsibility of the Department of Natural Resources (DNR) to the people of Washington State. We believe that this responsibility can be balanced between pure economic gain, and the health and welfare of the people within the Lake Whatcom watershed.

Lake Whatcom is the sole source of drinking water for more than 85,000 people. We feel that it would be extremely short sighted to allow proposed clear-cut logging outlined in the DNR Preferred Alternative 2 (Alternative 1 being a No Action Alternative), of the alternatives available for consideration as part of the DEIS, when any such logging outlined in this alternative could have severe watershed and safety impacts.

Of particular concern is logging on the Austin Creek Plat directly above Sudden Valley. The destructive potential and resultant safety issues for Sudden Valley residents are too blatantly obvious to be ignored, as much of our community's property lies adjacent to or below DNR managed forest lands. This is especially true in light of the 1983 catastrophic flooding which was a direct consequence of previous logging done in this area, and the fact that the Sudden Valley community has grown considerably since 1983, potentially putting far more people and homes at risk. While we understand that forest practices have changed in the last 20 years, logging on potentially unstable slopes remains risky and should only occur on slopes deemed by on-site evaluation to be stable.

To allow logging of this nature simply to accomplish DNR monetary goals, which could have

potentially devastative long term effect on the Lake Whatcom watershed and the community of Sudden Valley, would, we feel, be construed as gross mismanagement, at the very least. Therefore, we wish to formally request DNR, under your leadership, to consider a variation of the DEIS Alternative 3, which, as presently written, represents a combination of the old PDEIS Alternatives 3 and 4. This variation to the existing Alternative 3 is closely associated with Dave Montgomery's report (Mr. Montgomery, recognized as one of the state's top forest practice experts, is a Professor of Geomorphology and a licensed Geologist) in the PDEIS public comments, dated 10/25/02 which refers to a recent study published in the Canadian Geotechnical Journal, Schmidt, et al., 2001. This study found that "spatial variability in root strength-such as one might anticipate would result from a partial cut-was associated with those potentially unstable slopes that generated rapidly moving, highly destructive debris flows in the Oregon Coast Range." That report raises a red flag for the residents of Sudden Valley, most who live below potentially unstable slopes. We request that Alternative 3 include a prohibition of logging on potentially unstable slopes, and that it be your alternative of choice.

The Lake Whatcom Bill passed in 2000 by the state legislature recognized the importance of this lake for clean drinking water and public safety. The key to ensuring a safe and abundant drinking water supply is to protect streams, unstable slopes, potentially unstable slopes and wetlands from excessive logging and road construction. The DEIS Alternative 3, provides guidelines for all of these areas that are an improvement over the preferred alternative. It calls for broader buffers where no trees can be cut. Outside these buffers, where logging is appropriate, it employs longer cut rotations, retaining a 70% canopy closure, and prohibits road construction and chemical application which will ensure high water quality in our drinking water supply for years to come, while ensuring the safety of residents.

The previous PDEIS executive summary suggests that Alternatives 3 and 4 dedicate about 90% of the trusts lands' productive capacity to ecological and social benefits. In considering the population makeup of the Lake Whatcom watershed we believe the ecological benefits of a protective logging plan, more than offset the increase in timber harvest obtained from the DNR Preferred Alternative 2.

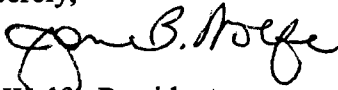
On behalf of the 5,000 residents of Sudden Valley, we therefore urge you, the Department of Natural Resources, and the Board of Natural Resources, to choose the DEIS Alternative 3, amended to ensure no logging on potentially unstable slopes, as your final selection. We believe this would provide the best possible protection for both our drinking water and from peak flows which would likely result in mud and debris damage, while still allowing the DNR to meet a measure of it's fiduciary responsibility.

Additionally, we recommend the continuation of a strong interjurisdictional committee (IJC) to work with the DNR after a final decision is made on a landscaping plan for the planned logging of the watershed. This committee would have the ability to stop activities deemed too risky, as recommended by independent, qualified geomorphologists, and would monitor the impacts of logging to our streams. A recent City of Bellingham letter, copy attached, addresses the suggested formation, funding and responsibilities of the IJC in detail. We believe that the IJC could also serve

as an educational and community relations agent for both the public and the DNR for issues concerning public safety and water quality.

Sudden Valley has a strong responsibility to preserve the high quality of Lake Whatcom water and to ensuring the safety of our residents. We see this same commitment from State Legislators, Bellingham City Management, the Whatcom County Council, Water District 10 Commissioners, and many other concerned organizations. Likewise we would like to believe the DNR has the same commitment.

Sincerely,



Jon Wolfe, President
Sudden Valley Community Association
Board of Directors

CC: Governor, Gary Locke
U.S. Senator, Maria Cantwell
U.S. Senator, Patty Murray
U.S. Representative, Rick Larsen
State House Representative, Kelli Linville
State House Representative, Doug Ericksen
State House Representative, Jeff Morris
State House Representative, Dave Quall
State Senate Representative, Harriet Spanel
State Senate Representative, Dale Brandland
Board of Natural Resources Members
Whatcom County Executive, Pete Kremen
Bellingham City Mayor, Mark Asmundson
Whatcom County Council
Citizens Advisory Committee, Steve Hood, Chairman
Lake Whatcom Water and Sewer District
SEPA Center Manager, Jenifer Gitchell (SEPA File No. 02-091300)

Attachments: 1



BELLINGHAM CITY COUNCIL

210 Lottie Street, Bellingham, Washington 98225
24-Hour Agenda Information Line (360) 647-6397
Telephone (360) 676-6970 Fax (360) 738-7418
Internet / Email: citycouncil@cob.org

July 18, 2003

Mr. Steve Hood

Committee Chair

Lake Whatcom Landscape Planning Committee

1204 Railroad Avenue, Suite 200

Bellingham, WA 98225

Dear Mr. Hood:

First, we wish to thank you for your diligent work with the Lake Whatcom Landscape Planning Committee. One of our highest priorities is ensuring that Lake Whatcom remains a source for high quality clean water far into the future. As approximately half of our watershed is managed by the Department of Natural Resources, a good landscape plan is key to our water quality.

In 1999 the first Lake Whatcom Advisory Committee produced a report and delivered it to the Commissioner of Public Lands. We continue to support the recommendations in that report, which led to further legislation, ESSB 6731. We fully supported ESSB 6731 that established your committee and we continue to support your efforts. According to ESSB 6731 the committee is to be ongoing: "The department shall establish an interjurisdictional committee for the development of the landscape plan, to review the site-specific activities and make recommendations. The interjurisdictional committee shall include two members of the public who have an interest in these activities."

We suggest that the interjurisdictional committee remains largely the same: two citizens plus technical representatives from Bellingham, Whatcom County and Water District 10, along with other affected or involved agencies to provide technical assistance.

This committee will have weighty responsibilities for 'on the ground' decisions that affect public safety and drinking water quality and we have two primary concerns: that there be adequate technical expertise available to the committee, given the importance of the resource and the proximity of neighborhoods to DNR lands; and that adequate financial resources be available on an ongoing basis to ensure long-term effectiveness of the committee.

To provide technical assistance to the committee we believe that it will be essential that specific expertise be available (on an as needed basis), most likely by contracting for

Bob Ryan
Council Member
1st Ward
2723 Cedarwood
671-1776

Gene Knutson
Council Member
2nd Ward
3035 Barkley Grove LP
734-4686

John B. Watts
Council Member
3rd Ward
1015 W. Toledo
647-2346

Dr. Grant Deger
Council Member
4th Ward
2103 Birch Circle
671-7444

Terry Bornemann
Council Member
5th Ward
903 Mason
224-6586

Barbara Ryan
Council Member
6th Ward
621 Canyon View Road
671-8376

Louise Bjornson
Council Member
At-Large
2829 Birchwood Avenue
733-7756

the services of a forest ecologist, a limnologist and a geologist, particularly a geomorphologist, as the circumstances may dictate. It is fair to say that neither the city nor county has available staff with the necessary technical expertise.

To provide sufficient funding for the committee, we suggest that a fee, or a percentage, be added to DNR's management fee to underwrite the cost of providing the committee with appropriate professional technical services. Logging on DNR lands is a revenue producing activity. As such, the activity should 'pay it's own way' and not be subsidized by citizens, the city, the county or local scientists. The mechanism for fee calculation could be a fixed surcharge for all sales in the Lake Whatcom watershed or could perhaps be variable based upon the risk posed by a particular sale or group of sales (and the consequent need for heightened technical evaluation).

We recommend that this additional portion of the management fee be placed in an account with disbursements made on a reimbursement basis. Out of that account the County, City and/or Water District 10 would submit for reimbursement of expenses incurred in the provision of services to the committee or for contracted services engaged by one of these entities on behalf of the committee. The details of any such arrangement can of course be adjusted to meet the accounting or other requirements of the Department.

We cannot overstate the importance of the on-the-ground decisions that the IJC will make. It may be possible that agreement on specific decisions will not be reached between DNR and the IJC. As the IJC is advisory to DNR, we would also ask that in the event of a disagreement over specific site management activity, such disagreement be mediated prior to the DNR taking any final action. A variety of dispute resolution services or professional mediators are available to assist in such efforts.

We look forward to working with you to see that a new Interjurisdictional Committee be formed that will have the ability to provide continuous, informed technical oversight of management activities on DNR lands within the Lake Whatcom Watershed and look forward to your response to our suggestions.

Sincerely,



Terry Bornemann, President
Bellingham City Council



Mark Asmundson, Mayor
City of Bellingham



Tel: 360.383.2000
Fax: 360.383.2009
PO Box 95 • 4956 Deming Rd.
Deming, WA 98244-0095
www.mtbaker.wednet.edu

Board of Directors

Ellen Dodson, President
Jim Freeman
Trish Hart
Russ Pfeiffer-Hoyt
David Smith

District Administration**Superintendent**

Dr. Richard Gantman
360.383.2000

Assistant Superintendent

Mark Venn
360.383.2000

Special Programs Director

Patricia Bieber
360.383.2012

Curriculum Director

Trina Hall
360.383.2013

School Principals**Acme**

Ellyn Erickson
360.383.2045

Harmony

James Frey
360.383.2050

Kendall

David Boeringa
360.383.2055

Mount Baker Jr. High School

Charles Burleigh
360.383.2030

Mount Baker High School

Principal: Tim Yeomans
Vice Principal: Steve King
360.383.2015

Transportation & Facilities**Supervisor**

Frank Cain
360.383.2060

October 6, 2003

SEPA Center

P.O. Box 47015

Olympia, WA 98504-7015 sepacenter@wadnr.gov

RE: Lake Whatcom Landscape Plan DEIS SEPA File No. 02-091300



As a recipient of revenue from county transfer lands managed by the Department of Natural Resources in the Lake Whatcom watershed, Mount Baker School District is concerned about the financial impact of proposals included in the Lake Whatcom Landscape Plan DEIS, September 8, 2003. The Department of Natural Resources has a legal obligation to the trust recipients to produce revenue on a long-term basis. Revenue generation should be maximized within the constraints of prudent, sustainable management.

Mount Baker School District urges the Board of Natural Resources to adopt No Action Alternative as the Lake Whatcom Landscape Plan. The No Action Alternative is the only alternative that meets the trust revenue production obligations while providing appropriate environmental protections. The only significant quality that differentiates the Lake Whatcom watershed from all other DNR-managed lands is the fact that Lake Whatcom serves as a municipal water supply. The November 15, 2001 letter from Megan White of Washington Department of Ecology included in the appendices to the DEIS indicates quite clearly that standard Forest Practice Rules combined with the current watershed analysis prescriptions are sufficient protection for water quality in Lake Whatcom watershed. If the Board of Natural Resources feels that there is a conflict between E2SSB 6731 and the trust responsibilities, the Board should submit this issue back to the legislature.

As a trust beneficiary, we appreciate the DNR's effort to provide financial impact information in the DEIS. As shown on Table DEIS 4-1, the revenue lost to all of the trusts if the Preferred Alternative is adopted is shocking. We are additionally concerned by the numbers shown by Figure 5, P.104, DEIS. The trust category of greatest concern to Mt. Baker School District (Trust1) would see 60% of its land area constrained by the Preferred Alternative. No consideration is given to a funding source and mechanism to reimburse Mount Baker School District for any future forgone income if the Preferred Alternative is adopted. If the Preferred Alternative is adopted, provision must be made to compensate the trust beneficiaries for the difference in revenue between the No Action Alternative and the Preferred Alternative.

As a school district our greatest concern is the impact on children. The revenue generated by county transfer land in Lake Whatcom watershed allows us to provide programs that make a real difference in children's lives. Don't trade our very real and important programs for environmental restrictions that would have no significant benefit to water quality.

Sincerely,


Board of Directors, Mount Baker School District

Superintendent

SEPA CENTER
WA DNR
Box 47015
OLY, WA 98504

Bo Richardson
Box 3143
Bellingham 98227

Greetings,

Years ago they logged the
steep slopes above my friend Larry
Flynn's house in ~~the~~ VAN ZANDT. After-
wards the slope SLID ONTO LARRY'S
Boat building shop.

When it became time for a
FINANCIAL SETTLEMENT, Larry began
getting threatening phone calls.

This seems to me not to be a
PREFERRED SOLUTIONS.

THANKS -

Bo Ruben



BELLINGHAM CITY COUNCIL

210 Lottie Street, Bellingham, Washington 98225
 24-Hour Agenda Information Line (360) 647-6397
 Telephone (360) 676-6970 Fax (360) 738-7418
 Internet / Email: citycouncil@cob.org

October 6, 2003

Dong Sutherland
Commissioner of Public Lands
 Department of Natural Resources
 P.O. Box 47001,
 Olympia, WA 98504-7001

Re: DEIS for the Lake Whatcom Landscape Plan

Dear Mr. Sutherland:

The Bellingham City Council appreciates the opportunity to provide comment on the Draft Environmental Impact Statement (DEIS) for the Department of Natural Resources (DNR) Lake Whatcom Landscape Plan. The Preferred Alternative outlined in the DEIS does a reasonable job of incorporating environmental protection measures to protect water quality, while allowing the economic viability of the trust lands to continue. However, the City Council has several points they would like to see strengthened and/or further clarified in the final version of the plan.

1. The authority, technical expertise and stable funding requirements for the Inter-jurisdictional Committee (IJC) cannot be emphasized enough. In order to provide effective oversight to the forest practices employed in this special watershed, the IJC must have the authority to evaluate, make recommendations, and modify timber harvest plans from time to time according to the best scientific expertise available. The DNR must provide a stable funding source for this committee to retain qualified peer review experts, and make certain the IJC has the power to alter plans that would likely have detrimental impacts on the watershed.
2. The community has specifically noted concern about logging on unstable slopes. The DEIS states the Preferred Alternative allows logging on ARS #1 unstable slopes. Please change this to be consistent with the rest of the document, which states that under the preferred alternative, no logging or road construction will be allowed on unstable slopes.
3. Please do not allow any oil or gas exploration, even with diagonal drilling, in the Lake Whatcom watershed.

Bob Ryan
 Council Member
 1st Ward
 2723 Cedarwood
 671-1776

Gene Knutson
 Council Member
 2nd Ward
 3035 Barkley Grove LP
 734-4686

John B. Watts
 Council Member
 3rd Ward
 1015 W. Toledo
 647-2346

Dr. Grant Deger
 Council Member
 4th Ward
 2103 Birch Circle
 671-7444

Terry Bornemann
 Council Member
 5th Ward
 903 Mason
 224-6586

Barbara Ryan
 Council Member
 6th Ward
 621 Canyon View Road
 671-8376

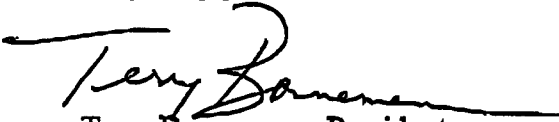
Louise Bjornson
 Council Member
 At-Large
 2829 Birchwood Avenue
 733-7766

October 6, 2003
Page 2 of 2

4. Monitoring of sediment loads in streams is essential to understand and minimize the impacts of logging and road building in the watershed. Please monitor the streams for sediments during times of DNR activities in the watershed. The City of Bellingham has invested in monitoring stream flows as part of the DOE TMDL Study now in progress. It would be helpful to capture this DNR generated data as well, recognizing that a proper understanding of watershed dynamics is critical for the future protection of this public water supply reservoir.
5. The financial analysis in the DEIS notes an increase in logging revenues of 68% in the first two decades over the 200 year average. Please clarify the relationship between revenue streams and logging activities in a more detailed management plan, and correlate the increase of revenues over a short period with the cumulative environmental impacts.

Thank you for your attention to these concerns. We look forward to reviewing the Final Plan, and we thank the Lake Whatcom Landscape Committee for their diligence in creating a document that will responsibly protect reservoir water quality from unnecessary degradation, as well as generate income for public benefit from this valuable and precious public resource.

Very truly yours,



Terry Bornemann, President
On behalf of the Bellingham City Council



October 7, 2003

Ms. Jennifer Gitchell
DNR SEPA Center
1111 Washington Street SE
P.O. Box 47015
Olympia, WA 98504-7015

RE: AFRC Comments On Lake Whatcom Landscape Plan DEIS (File #02-091300)

Dear Ms. Gitchell:

The American Forest Resource Council (AFRC) is an association of the forest industry, which represents numerous Department of Natural Resources (DNR) Timber Purchasers with operations in Washington, Oregon, California, and Idaho. We appreciate the opportunity to comment on the Lake Whatcom DEIS.

The DNR Timber Purchasers Committee is a standing committee of AFRC; this group (which includes both AFRC and non-AFRC members) provides the principle interaction between all DNR timber purchasers and the Department, together with the Board of Natural Resources (Board). AFRC members and the DNR Timber Purchasers Committee have a vested and vital interest in the on-going and future management of State trust lands in and around the Lake Whatcom watershed.

AFRC provided substantive comments (10-02, attached) on the Lake Whatcom Landscape Plan Preliminary Draft Environment Impact Statement (PDEIS). These comments were also subsequently presented directly to the Board as public comment. These earlier comments remain as relevant today as they did almost a year ago.

In summary, AFRC commented that:

1. Active forest management is the answer, not the problem in Lake Whatcom. An EIS Alternative should be added that maximizes trust revenues while maintaining current resource protections.

1500 SW First Avenue, Suite 330
Portland, Oregon 97201
Tel. (503) 222-9505 • Fax (503) 222-3255

2. An EIS Alternative is needed that evaluates partial or total divestiture (or repositioning) of trust lands to assets outside the Lake Whatcom Watershed.
3. The current Alternatives fail to balance social, economic and environmental values; a stated goal of the Board of Natural Resources.
4. Alternatives other than the No Action Alternative substantially reduced net present values without any offsetting tangible benefits in water quality, public safety, or other non-timber incomes.
5. The Lake Whatcom Landscape planning process fails to link with DNR's on-going Sustained Yield Process as required by ESSSB #6731.
6. The Lake Whatcom Landscape Plan management objectives that were "adopted" by DNR and the Committee should be reviewed for consistency with the 1992 Forest Resource Plan and Trust Mandate.
7. Private Foresters and knowledgeable stakeholders were specifically excluded by the previous Commissioner of Public Lands from legislatively mandated review committees.
8. DNR has a legal obligation to seek compensation for altered land management; this has not been discussed thus far in the environmental review process.
9. The Alternatives include trust lands outside the watershed.
10. Information from Oregon State University on Water Supplies From Forest Watersheds should be incorporated in the EIS.
11. DNR's Slope Stability Map for the Lake Whatcom Watershed lacks accuracy and fails to separately map "Unstable Slopes" and "Potentially Unstable Slopes".
12. PDEIS Alternative #1 (No Action Alternative) was inaccurately described and is not a true No-Action Alternative.
13. The no-cut riparian management zones on Type 5 Streams are arbitrary and exceed the requirements of ESSB #6731.

Regarding the current DEIS, AFRC offers the following comments:

- **The range of alternatives analyzed in the DEIS does not encompass the "reasonable range" required by SEPA. An EIS alternative needs to be developed and analyzed that: (1) meets current Board and DNR policies, (2) meets the spirit and intent of ESSSB #6731 for protecting slope stability, water quality, and cultural resources, and (3) fulfills the Trust Mandate to maximize income to beneficiaries.**

Although the DEIS facially contains three alternatives, in reality there are only two. The DEIS states that the No Action Alternative “will not be implemented in the Lake Whatcom Landscape.” The Preferred Alternative would only allow active forest management on 51% of the landscape. The DEIS states that Alternative 3 was carried forward at the request of the Landscape Committee (Committee) “to bracket the range of options for simultaneously providing environmental protection and trust revenue.” Thus, the DEIS admittedly only has a single alternative that “brackets” one side of a reasonable range of alternatives, as the No Action Alternative will not be implemented (and presumably is not implementable).

The No Action Alternative may be a misnomer. SEPA requires that a reasonable range of alternatives be evaluated as part of EIS process. The DEIS needs at least one other alternative to “bracket” a range of alternatives. This will allow for different strategies that maximize trust income, which will meet the trust mandate and operate within current policies and the intent of ESSB #6731. We repeat that DNR should develop and analyze an intensive management alternative that more closely resembles the management of other forest landowners in the watershed.

- **The DEIS analyzes 21 Management Objectives and associated strategies for each Alternative. These objectives were written by DNR and the Landscape committee and contained policy issues more correctly acted on by the Board of Natural Resources. DNR and the Landscape Committee appears to have overstepped the planning authority granted to them by Forest Plan Policy #16 (Landscape Planning) and ESSB #6731.**

The DEIS does not contain an explicit management objective and associated strategies to address revenue generating mechanisms for Lake Whatcom timber production. Revenue objectives were included for higher value commercial products, communications sites, special forest products, oil and gas, green certification and carbon sequestration. The absence of an explicit timber production revenue objective and strategy is a glaring omission.

- **Removing 49% of the Lake Whatcom landscape from active forest management under the Preferred Alternative will require DNR to more intensively manage other trust lands to meet its trust mandate and fiduciary responsibility. The DEIS fails to analyze the probable significant environmental effects on other landscapes resulting from this proposed shift.**
- **ESSB#6731 mandates that RMZ’s will be established “along all streams,” but does not specify their widths, and does not preclude active management of riparian areas. The DEIS preferred alternative includes 100-foot buffers of all Type 4 streams and 33-foot buffers on all Type 5 streams to protect water quality with no supporting science. Current forest practice rules, ESSB #6731, and the HCP should guide riparian protection and management.**
- **The DEIS fails to fully analyze economic impacts between the proposed alternatives. Projected revenues (Table 7) appear substantially underestimated.**

A financial assessment was included in the PDEIS (Appendix Section PDEIS-4) but was conspicuously absent in the DEIS. The PDEIS financial analysis computed differences in net present values (NPV) for each of the alternatives. The DEIS simply reports differences in undiscounted revenues and does not report differences in NPV. NPV is a better measure of true economic differences between the alternatives and should be included in the EIS.

DEIS Table 6 shows an annual average *reduction* in harvest volume between the No Action Alternative and the Preferred Alternative of 2,788 MBF (50% reduction). The average annual stumpage return is computed at \$342/MBF for the No Action Alternative (\$1,746,000/5,111 MBF). However, the DEIS at Table 7 shows an average annual revenue reduction of \$214,000 between the No Action Alternative and the Preferred Alternative (12% reduction). Regarding Table 7, it would appear that the average annual revenue reduction should be closer to \$953,496 ($\$342 \times 2,788$ MBF) between the No Action Alternative and the Preferred Alternative. This is an apparent error with a 50% reduction in average harvest volume resulting in only a 12% reduction in average revenue.

- **Important information will soon be developed regarding slope stability and mass wasting in DNR's Northwest Region as a result the upcoming Unstable Landform Study and Zonal Landslide Hazard Study. Provision should be made to include this information in the EIS.**
- **The DEIS Appendix contains a study plan for the measurement of mercury in fish for a Minnesota forest. The DEIS, at page 48, infers that slash burning may be the unexplained source of mercury in Lake Whatcom. A far more likely source is naturally occurring cinnabar deposits in the Nooksack drainage. At best, the appendix study plan is "pre-science" and should be removed from the EIS. We suggest a study of the relationship between naturally occurring cinnabar and mercury presence.**

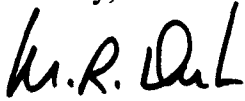
In closing, we respect the Department's attempts to deal with issues surrounding management of DNR's Lake Whatcom lands. We strongly feel, however, that the initial exclusion of land management professionals with substantial interest expertise corrupted the proceedings. The process and product are fatally flawed until the department corrects the consequences of that action.

Rather than beginning the process anew, we suggest the department seek additional guidance from the legislature. DNR has a strong case with improved science, regulations and land management techniques, all unavailable when the legislation was passed. We also suggest the legislature will be responsive to the fact that their mandated process was initially implemented to exclude some citizens.

Please contact us if you have questions or require additional information or clarification.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "M.R. Dick, Jr.", written in a cursive style.

Malcolm R. Dick, Jr.
Washington Manager
AFRC

attachment



October 28, 2002

Barbara MacGregor
DNR SEPA Center
1111 Washington Street SE
P.O. Box 47015
Olympia, WA 98504-7015

RE: SEPA Comments On Lake Whatcom Landscape Plan PDEIS by AFRC

Dear Ms. MacGregor:

Thank you for the opportunity to comment on the Lake Whatcom PDEIS.

The American Forest Resource Council (AFRC) is an association of the forest industry that represents numerous Department of Natural Resources (DNR) Timber Purchasers in Washington, Oregon, California, and Idaho. The DNR Timber Purchasers Committee is a standing committee of AFRC; the committee and its staff provide the principal interaction among DNR timber purchasers, DNR and the Board of Natural Resources (Board).

AFRC members have a vital interest in the on-going and future management of DNR managed trust lands in the Lake Whatcom watershed. All softwood lumber mills identified in the Commercial Timber Assessment (PDEIS, Appendix Section O) currently are members of AFRC. AFRC appreciates this opportunity to provide substantive comments on the Lake Whatcom DNR Landscape Plan Preliminary Draft Environmental Impact Statement (PDEIS) under the State Environmental Policy Act (SEPA). Our specific comments follow:

Active Forest Management Is The Answer, Not The Problem in Lake Whatcom. An EIS Alternative That Maximizes Trust Revenues While Maintaining Current Resource Protections Should Be Added

Legislation affecting Lake Whatcom, and PDEIS, is rooted in activist opposition to a single proposed trust land timber sale and concern over a poorly designed forest road. A subsequent Board tour clarified that the halted sale required the timber sale purchaser to reconstruct the road to current forest practices standards. Nonetheless, activists pressured local elected officials, and the previous Commissioner of Public Lands to pass legislation that resulted in the current PDEIS. Water quality and public safety appear to be surrogates for opposition to land management activities on DNR managed trust lands.

1500 SW First Avenue, Suite 330
Portland, Oregon 97201
Tel. (503) 222-9505 • Fax (503) 222-3255

The discussion of PDEIS alternative and management objective primacy on page 27 is completely devoid of any discussion (or apparent acknowledgement) of the Trust Mandate. The 1992 Plan provides clear guidance on this point. Page B-1 of the 1992 Plan states, "*The question of balancing greater environmental protection and trust income should be approached from four perspectives: 1) the prudent person doctrine; 2) undivided loyalty to the trust beneficiaries; 3) intergeneration equity, and 4) the problem of foreclosing future options.*" **The EIS needs a thorough discussion of how each EIS Alternative helps DNR and the Board fulfill the Trust Mandate.**

Private Foresters and Knowledgeable Stakeholders Were Excluded From the PDEIS

A well-intended process, albeit sanctioned on a mistaken premise, was co-opted by special interests when knowledgeable forest industry professionals and adjacent landowners were excluded from Committee participation. We doubt the legislature had this in mind when they passed ESSSB 6731. This action likely violates the bill's intent; further, it violates the Trust Mandate and Forest Resource Policy 17.

FRP Policy 17 states, "*The Department will solicit comments from interested parties, including local neighborhoods, tribes and governmental agencies when preparing landscape-level plans.*"

Discussion

As part of the landscape-level planning effort, the department will consider information from public entities, adjacent landowners and other interested parties.

The department will attempt to integrate the plans of others so that state forest lands are managed in a comprehensive manner and environmental impacts are minimized.

The department will present its planned timber harvest schedules to the public at biannual reviews."

Purchasers and landowners actively sought to take part in the Committee process and were rebuffed. We were not ignored...we were excluded from the process, which probably is illegal but certainly is inappropriate. Many of the obvious problems with the committee proposals and alternatives could have been avoided had all stakeholders been able to participate. We hope in view of that action, these comments will be taken as input that was missing in original discussions of the Lake Whatcom planning process, and that appropriate revisions will be made that reflect our belated input.

The Blanchard Mountain Timber/Recreation Assessment Should Be Incorporated in the EIS

A new resource and recreation value study on Blanchard Mountain DNR lands confirms that timber production produces the highest economic value for state trust lands and trust beneficiaries. This information strongly suggests that multiple resource values *simultaneously* can be accommodated on Whatcom County lands adjacent to Lake Whatcom. The findings from this new assessment should be incorporated in the Draft Environmental Impact Statement (DEIS).

The PDEIS Fails to Link With DNR's On-Going Sustained Yield Process as Required by ESSSB #6731

Legislation that created the Lake Whatcom Landscape Planning Committee (ESSSB 6731) also requires in Section 1-(4) that revised management standards for Lake Whatcom should be consistent with the sustained yield established by the Board of Natural Resources. This fact is not prominent in or discussed by the PDEIS. The PDEIS alternatives do not match the seven different alternatives presently being considered by the Board of Natural Resources for all other state lands in western Washington.

EIS alternatives should be consistent with SHC alternatives including creation and evaluation of options that will achieve economic and water quality objectives.

PDEIS Management Objectives "Adopted" By The Department and Committee Should Be Reviewed For Consistency With the 1992 Forest Resource Plan and Trust Mandate

Twenty-one management objectives are identified in the PDEIS (pages 25-26). These objectives need to be reviewed in the context of the overall 1992 Forest Resource Plan (1992 Plan), in particular the Trust Mandate. For example, there is no explicit management objective in the PDEIS that provides for maintaining or increasing revenues from timber production to provide sustainable income to trust beneficiaries. This is a glaring omission in PDEIS objectives.

Forest Plan Policy #16 (Landscape Planning) provides for the establishment of overall landscape management objectives; this policy explicitly states that participation from outside professionals in the fields of road engineering, forestry, and economics should be encouraged. These disciplines were conspicuously absent from the Committee (See below discussion), and this omission is reflected in the deficiencies present in the limited range of alternatives presented in the PDEIS.

Current PDEIS Alternatives Fail to Balance Social, Economic and Environmental Values; a Stated Goal of the Board of Natural Resources

The Board repeatedly has opined that they, and the public, seek to balance social, economic and environmental values (see PDEIS appendices). Alternatives #3-5 clearly fall outside these parameters. DNR lands inside the watershed have the biological capacity to generate \$3.3 million annually for trust beneficiaries, and can generate \$1.6 million annually under the Habitat Conservation Plan (HCP). Alternatives #2-5 would produce trust revenues significantly below these amounts (see below discussion). In addition, active forest management is seen as the best means of protecting Lake Whatcom's water quality. **As the Board ultimately will approve a Lake Whatcom Landscape Plan, any EIS Alternative must be consistent with the Board's stated goals and objectives. The alternatives should be rewritten to achieve such consistency.**

Alternatives #2-5 Substantially Reduce Net Present Values Without Offsetting Benefits in Water Quality, Public Safety, or Other Non-Timber Incomes

Using a 6% real discount rate, the PDEIS Financial Assessment (Appendix Section PDEIS-4) reveals substantial reductions in Net Present Value (NPV) for Alternatives #2-5 of: -\$9.7 million, -\$23.3 million, -\$23.7 million, and -\$27.3 million, respectively, when compared with forest management under Alt. 1. These reductions are for *timber revenues only* and do not include other direct and indirect local and statewide economic benefits that accrue to commercial forest operations and milling. Thus, the economic magnitude of projected NPV reductions substantially is understated. The document should reflect this fact.

The PDEIS Financial Assessment of benefits from other income opportunities deserves more discussion in the EIS, using this the following statement as a base:, "*(i)t appears highly unlikely that combined revenues from carbon sequestration, certified lumber production, and leasing of trust land for recreation activities could financially justify the choice of either of the landscape alternatives...over the reference alternative (Alternative 1)*" This essentially is the same conclusion from the recent Blanchard Mountain assessment. Discussed later is our concern that Alt. 1 accurately does not reflect "no change" conditions and should be rewritten.

The 1992 Plan, 1997 HCP, 1997 Lake Whatcom Watershed Analysis, 1997 Draft Lake Whatcom Landscape Plan, and 1998 Forest & Fish Rules, guide current DNR management inside the Lake Whatcom Watershed. The Departments of Health and Ecology both said (see above comments) that current DNR policies in Lake Whatcom adequately protect public resources. Thus, under the *Prudent Person Doctrine* of the *Trust Mandate* (1992 Forest Resource Plan), it must be asked what additional benefits accrue to either the trusts or public from even analyzing (or contemplating) alternatives that fail a reasonable cost vs. benefit analysis, and that are clearly adverse to the economic interests of the trust beneficiaries?

PDEIS Alternatives #3-5 are "unreasonable in their range" under SEPA and violate the prudent person doctrine. New alternatives must be developed to comply with the trust mandate, the prudent person doctrine, SEPA and legislative instructions.

Water quality concerns that served as the basis for legislation empowering the Lake Whatcom DNR Landscape Planning Committee (Committee) were legitimate but misdirected. The Department of Ecology is on record as saying, “*(p)roperly managed commercial forestland has been recognized as the most benign active land use for watershed protection for some time.*” The Department of Heath said, “*(i)t is our understanding that very few of the potential contaminant sources identified in the Source Water Protection Plan for Lake Whatcom could originate from State Forest Lands or DNR activities*” (PDEIS Appendices).

Whatcom Lake has serious water quality issues that should be addressed by Whatcom County and agencies that deal with coliform, nutrient loading and other contaminants. Properly conducted active forest management is consistent with watershed protection and can help mitigate problems uncovered during DNR’s landscape management planning.

The PDEIS should include one or more Alternatives, which optimize trust revenues and economic benefits while providing reasonable watershed protection by DNR. To the extent feasible, the PDEIS should highlight water quality problems discovered during the forest management investigations.

An EIS Alternative Is Needed That Evaluates Partial or Total Divestiture (or Repositioning) of Trust Lands to Assets Outside the Lake Whatcom Watershed

AFRC supports maintenance of DNR’s managed forest landbase. The PDEIS should address sale or trade of some or all lands in the basin. The consideration for the sale or exchange of trust lands is imbedded in each PDEIS Alternative under Objective 18: Consider Other Revenue Generating Mechanisms. This imbedded consideration is not developed as part of the PDEIS and, as such, is inconsistent with SEPA. **The EIS should include a least one Alternative that specifically describes and analyzes asset divestiture.**

As a matter of record, AFRC firmly believes most Lake Whatcom trust lands can be managed to optimize timber revenue and water quality. Two state agencies, whose business is water quality, believe forest management is the best means of protecting water quality. DNR, however, needs to substantively review divestiture as a part of the SEPA process.

33-150 foot No-Cut Riparian Management Zones on Type 5 Streams Are Arbitrary, Capricious, and Exceed The Requirements of ESSSB #6731.

PDEIS Alternatives #2 (33-foot), and Alternatives #3-5 (150-foot), include no-cut Riparian Management Zones (RMZ's) on Type 5 streams. ESSSB #6731 simply describes that RMZ's will be established "along all streams", does not specify their widths, and certainly does not preclude active management within Type 5 RMZ's, particularly to achieve other habitat objectives. PDEIS Alternatives #2-5 do not reflect this flexibility as provided by the legislation and, thus, do not reflect a reasonable range of imbedded Type 5 RMZ alternatives as required by SEPA. Forest Practices rules, DNR's HCP, the 1992 FRP all address riparian zones and should provide guidance on riparian zones.

AFRC sincerely appreciates this opportunity to comment on the PDEIS. We look forward to working with the Department as the Lake Whatcom Landscape Planning process moves forward.

Please contact us if you have questions or require additional information.

Thank you.

Sincerely,

Malcolm R. Dick, Jr.
Washington Manager

Attachment

C/ Board of Natural Resources
Tom Partin, President, AFRC
DNR Timber Purchasers

The PDEIS Slope Stability Map Lacks Accuracy and Fails To Separately Map “Unstable Slopes” and “Potentially Unstable Slopes

The PDEIS Slope Stability Assessment (Appendix Section G) describes a process by which a Sensitive Area Slope Stability Map was prepared (map G-2). The issue of unstable slopes vs. potentially unstable slopes is a key issue as a result of a literal interpretation of ESSSB #6731, which states, “*harvest and road construction upon **potentially unstable slopes** shall be carefully regulated.*” This legislation further states that road construction or reconstruction is prohibited on unstable slopes. However, the Slope Stability Assessment states “*...the specific location of stable, potentially unstable, and unstable slopes are probably not represented entirely accurately on the map.*” Furthermore, the locations of unstable slopes and potentially unstable slopes have not been mapped separately. The Assessment instead defers to definitions and field identification procedures as operational alternatives.

There is an enormous difference between unstable slopes and potentially unstable slopes. For the purpose of developing landscape alternatives and their analysis, a map is required that distinguishes between the two. They were not mapped separately and existing maps are admittedly inaccurate, both of which call into question the very basis upon which the PDEIS Alternatives were developed and analyzed. As such, the mass wasting analyses, particularly in Alternatives #2-5, are fundamentally flawed and need to be rewritten.

PDEIS Alternative #1 (No Action Alternative) Is Inaccurately Described And is Not the True No-Action Alternative

The PDEIS No-Action Alternative purportedly analyzes DNR’s existing policies, procedures, legal requirements and management commitments, and supposedly is consistent with the Tier 3 alternative identified in the sustainable harvest calculation (SHC). Alternative 1, however, appears to have been developed consistent with the 21 PDEIS management objectives (“*with the advice of the Committee*”) presumably absent review and approval by the Commissioner of Public Lands (Commissioner) and the Board (PDEIS pp. 28-34). Furthermore, the DNR Westside Tier 3 SHC Alternative does not contain these same management objectives.

The EIS No-Action Alternative accurately must portray DNR’s existing policies, procedures, and legal requirements absent landscape-specific management objectives. PDEIS Alternative #1 should become Alternative #2 in the EIS, which incorporates appropriately reviewed (and approved) landscape management objectives. A new #1 should be developed that truly reflects current (no action) conditions.

DNR Has a Legal Obligation To Seek Compensation For Altered Land Management; This Was Not Identified in the PDEIS

The law requires compensating DNR for additional watershed protections. RCW 79.01.128 states, *“In the management of public lands lying within the limits of any watershed over and through which is derived the water supply of any city or town, the department may alter its land management practices to provide water with qualities exceeding standards established for intrastate and interstate waters by the department of ecology: PROVIDED, That if such alterations of management by the department reduce revenues from, increase costs of management of, or reduce the market value of public lands the city or town requesting such alterations shall fully compensate the department(emphasis added).”* This statute should be recited and discussed in the PDEIS.

The PDEIS Alternatives Include Trust Lands Outside The Watershed

Map A-2 in the PDEIS Appendices identifies approximately 1,200 acres of state lands (7.5% of total) that are outside the hydrographic boundary of Lake Whatcom that nonetheless have been included in the PDEIS Alternatives. Applying the restrictions embodied in ESSSB #6731 to lands outside the hydrographic boundary cannot possibly have any material physical impact on water quality inside the watershed.

The EIS should exclude additional restrictions described in ESSSB #6731 from applying to trust lands outside the Lake Whatcom hydrographic boundary.

Information From Oregon State University on Water Supplies From Forest Watersheds Should Be Incorporated in the EIS

Attached to these comments is a publication entitled *Municipal Water Supplies from Forest Watersheds in Oregon: Fact Book and Catalog* prepared by Adams & Taratoot at OSU. This publication provides a concise understanding of the complex relationships between water supplies and forest management. A principal finding of the OSU study is the demonstrated need to protect water supplies from forested watersheds from the disastrous effects from wildfire.

Lake Whatcom watershed has a history of stand replacement fires. A discussion of wildfire risk and mitigation completely is absent from the PDEIS Fire Management Assessment (Appendix Section M). Although The Oregon review focuses on 30 major municipal water systems in Oregon, the information is transferable to Lake Whatcom. Key findings from this report should be incorporated into the PDEIS Water Quality Assessment (Appendix Section E).

October 5, 2003

SEPA Center
P.O. Box 47015
Olympia, WA 98504-7015

Comments on SEPA File No. 02-091300

As a life long resident of Whatcom County, a Certified Forester and small forest landowner, I would like to submit the following comments on the Lake Whatcom Landscape Plan. My forest management experiences in Whatcom County, including the Lake Whatcom Watershed, leads me to the conclusion that appropriate management of DNR trust lands in the Lake Whatcom watershed should be similar to the “no action alternative”. This alternative has been developed over the years through numerous scientific studies and public involvement. It sufficiently assures public safety and protects the lake’s water supply, while providing the required trust revenues. I would concur with the Departments of Ecology and Health that forest management is the preferred land use to protect water quality. I strongly disagree with the planning committee’s preferred alternative and the other more restrictive proposal’s. These alternatives were politically driven agendas, with solutions spawned by individual efforts to prove “one person can make a difference”. One motivated person can make a difference, but the rest of us have to pay the price. Here are a few of my main points:

- This watershed with its second and third growth forest has been studied for years and present regulations provide more than adequate protection.
- The listed alternatives would be bad policy for DNR trust lands. What is finally done for Lake Whatcom sets precedence and will be pushed onto other trust lands.
- I am very concerned that more restrictions for public lands in Lake Whatcom will also be imposed as additional regulations for small forest landowners in the watershed. The impacts of this would be very counter productive.
- It is also very bad policy to have a plan with no flexibility or ability to apply adaptive management in the future, as new information is discovered. Having a plan that says 50% of the land can never be touched and aerial applications of herbicides and fertilizers can never be used, are not reasonable long term management objectives.
- The revenues that go to the trust recipients should not be reduced any further. The federal forest solution to just replace timber receipts with tax dollars should not be continued.
- Many other businesses in this area depend on the timber harvested on trust lands. These include sawmill employers, loggers, construction crews, reforestation workers and all the other related businesses.

Starting with the legislation and ending with the planning committee, this was a flawed process, with emotion, deception and politics leading the charge. I request that the Forest Board use good common sense and support the rules presently in place to protect the Lake Whatcom watershed.

Sincerely,

Tom Westergreen
4800 south Pass Road
Sumas, WA 98295

To Whom It May Concern,

Oct 7th 03

Please accept this letter as my comments on DNR's draft environmental impact statement's proposals for the Lake Whatcom Landscape Plan. As state trust land this land must not be solely managed to supply revenue from logging and provide public infrastructure, but also to maintain clean drinking water, wildlife habitat and for recreational enjoyment. Between 30,000-50,000 tourists and visitors bring business to the local economy each year to experience the natural beauty and recreational opportunities these forest lands provide. All of these factors must be considered while formulating this landscape plan that will substantially effect each one depending on how thoroughly it is crafted.

As part of the public for which this land is held in trust and managed by DNR, here are my suggestions for the Lake Whatcom Landscape Plan. In accordance with SB 6731, I agree that heavy road construction on unstable slopes must be strictly prohibited, protection of all type 5 streams is crucial, and the establishment of a strong interjurisdictional committee to oversee all DNR activities in the watershed is essential. It is also important that the interjurisdictional committee be comprised of specialists with technical expertise, or that the committee at least have access to them as needed. As DNR's Logging supplies revenue from public trust lands to provide certain

public Services, a percentage of that revenue should pay committee expenses.

DNR's draft environmental impact statement's financial analysis suggested a 68% increase in logging for the first two decades. However, the environmental impacts of this 68% increase were not addressed. These impacts must be analyzed before this increase is allowed; that is the purpose of an environmental impact statement. There should also be a prohibition on any oil and gas exploration and extraction, larger buffers on streams, and longer rotations of harvesting to ensure environmental integrity and long term public health and safety. Thank you for taking these concerns into consideration in regard to the development of the Lake Whatcom Landscape Plan.

Sincerely,

Julia Spencer
2400 Humboldt St.
Bellingham, WA
98225
(360) 671-4152

RECEIVED

OCT 18 2003

ASSET MANAGEMENT
& PROTECTION DIVISION



STATE OF WASHINGTON

OFFICE OF COMMUNITY DEVELOPMENT

Office of Archaeology and Historic Preservation

1063 S. Capitol Way, Suite 106 • PO Box 48343 • Olympia, Washington 98504-8343 • (360) 586-3065
Fax Number (360) 586-3067 • [http:// www.oahp.wa.gov](http://www.oahp.wa.gov)

October 8, 2003

Ms. Jenifer Gitchell
SEPA Center Manager
PO Box 47015
Olympia, WA 98504-7015

Re: Draft DEIS for the Lake Whatcom
Landscape Plan 02-091300

Dear Ms. Gitchell:

Thank you for providing notification of the DEIS for the Lake Whatcom Landscape Plan for comment.

We recommend the OAHp be invited to participate in any working groups formed to address archaeological resource protection and management in the Lake Whatcom Landscape Plan. To protect archaeological resources per RCW 27.53 and 27.44 and WAC 25-48, we recommend a professional archaeological survey be conducted *prior* to any maintenance, re-vegetation, road construction or abandonment, tree harvesting or any other action that would disturb the ground. This professional survey would be part of the specific guidelines and requirements for the archaeological site category outlined in the Preferred Alternative. We would appreciate the opportunity to review and comment upon any archaeological surveys or management plans that involve archaeological sites or historic structures that are developed through this process.

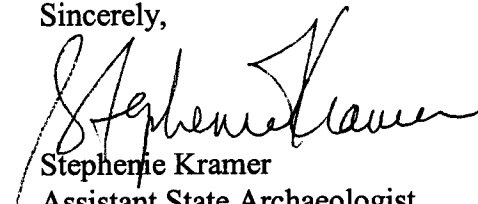
Further, we recommend the development of an archaeological predictive model to facilitate this process. The development of a predictive would allow land use actions to be screened well in advance for the probability of the presence of cultural resources and allow for planning, management and avoidance of those resources consistent with any agreements developed within consultation among DNR, OAHp and the affected Tribes.

If any federal funds or permits are involved in this project, Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations, 36CFR800, must be followed to determine if any of the proposed actions will have an adverse effect on historic properties, including archaeological sites. We would appreciate receiving any correspondence or comments from concerned tribes or other parties concerning cultural resource issues that you receive as you consult under the requirements of 36CFR800.4(a)(4). If you have any questions concerning the Section 106 process, please do not hesitate to call Rob Whitlam at (360) 586-3080.

Ms. Jenifer Gitchell
SEPA Center Manager
PO Box 47015
Olympia, WA 98504-7015
Page 2

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer. Should additional information become available, our assessment may be revised. If you have any questions or concerns, please do not hesitate to contact me at (360) 586-3083 or by email at StephenieK@cted.wa.gov.

Sincerely,



Stephenie Kramer
Assistant State Archaeologist
(360) 586-3083
Email: StephenieK@cted.wa.gov

cc: Mary Rossi
Jeff Chalfant
John Guenther
Lee Stilson
Jim Thompson

SEPA Center
Department of Natural Resources
P.O. Box 47015
Olympia, WA. 98504-7015

Re: Lake Whatcom Landscape Plan DEIS

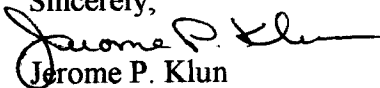
I recently returned from another meeting on the DEIS for the Lake Whatcom Watershed and the surrounding areas. A large number of people braved a heavy rainstorm to attend this meeting which impressed me to the point of writing this letter.

I was not living in Sudden Valley at the time the side of Lookout mountain washed across lake Louise Road, but I've seen many pictures of the damage done and heard stories from many of the people who lived here at the time. It is unreasonable to even think that the Department of Natural Resources could ever allow this to happen again. However, I recently drove past the carnage that was caused above the village of Glen Haven. I'm quite certain that no members tasked with making the decision to clear cut the area, actually live in Glen Haven. I would further question if any on the decision making committee have been to Glen Haven to see the clear cut areas high up on the mountain or tried to envisage what will happen to the homes when the side of that mountain gives way.

Consequently, the responsible thing for the DNR to do to ensure the welfare of the individuals in harms way as well as for maintaining a supply of clean drinking water well into the future is to implement a comprehensive DEIS that is approved by an Interjurisdictional committee with the ability to oversee, and if necessary, to stop work and assess fines when actions beyond the scope of the DEIS are implemented. Until a group with this authority is in place, atrocities of the type incurred on previously logged areas within the watershed will be the norm rather than the exception.

I look forward to seeing these additions on the final draft of the landscape plan.

Sincerely,



Jerome P. Klun
764 Sudden Valley
Bellingham, Wa 98229

TB: SEPA Center
DNR
PO Box 47015
Olympia, WA 98504

Oct. 6, 2003

Re: Lake Whatcom Landscape Plan DEIS

I very much appreciate the DNR's efforts to seek comments from citizens regarding the Lake Whatcom watershed.

I live in Sudden Valley and am very concerned about the quality of water in the Lake Whatcom Reservoir. Therefore, I am requesting that the DNR make several changes to the proposed alternative.

First, I believe the DNR should spell out the exact logging plans to the residents of Whatcom County. The DEIS only addresses the 100-year average, yet the DNR will be logging significantly more than that for the first two decades of the plan. If this is the case, then that aspect of the plan should be included in the DEIS.

I am very concerned about logging on unstable slopes. On page 106 of the DEIS the DNR states there will be no logging on unstable slopes, yet the proposed alternative allows logging on ARS #1 unstable slopes. I feel very strongly that no timber harvesting should be allowed on unstable slopes, nor should roads be permitted to be built on unstable slopes.

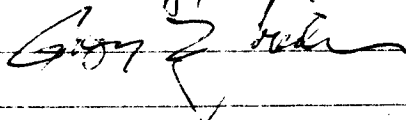
I am a strong proponent of an interjurisdictional committee that is not only comprised of independent scientists, but also has sufficient authority to halt risky activities.

mead

Finally, I was surprised to learn that the proposed alternative allows gas and oil exploration in the Lake Whatcom watershed. I feel very strongly that this should be removed.

Thank you for the opportunity to provide these comments.

Sincerely,



Gregory L. Friedman
828 Sudden Valley
Bellingham, WA 98229

02-091300

Michele Ames
517 Lakeside dr.
Alger WA 98294
595-9650

I am a Glenhaven resident and am opposed to further logging on the mountain backing our neighborhood. This is a well established and populated community. The logging is too close to such a community jeopardizing potentially, water supplies, increasing chances for mud slides and property values may lower.

Michele Ames

Re Lake Whatcom Landscape Plan DEIS

Thank you for the opportunity to comment on the DEIS.

I live in Whatcom County and drink the water from Lake Whatcom Reservoir. The quality of the water is of great importance to me and my family.

I am writing to ask you to make several changes to your preferred alternative

1. I ask that you provide the citizens of Whatcom County with your actual logging plan. Please include your intention to log significantly more ~~for~~ during the first two decades.
2. Accept Alternative #3
3. Do not allow the building of roads or logging on any unstable slopes and require scientific approval on any potentially unstable slopes.
4. Require scientific & ecological input to the interjurisdiction committee. Add monitoring of streams for sediment and general health
5. Respect and accept the Lummi Nation comments

6. Allow no logging or road building on any wet lands and provide a buffer for each.
7. Accept the 200 year rotation.
8. Allow no oil or gas exploration.
9. Replanting must be a part of any plan.

(This address
is in Whatcom
County
Glennhaven)

Kenneth Mc Dory
Linda L. Dory
3032 Maple Place
Sedro Woolley, Wa

98284

Doti Leu
802 Sudden Valley
Bellingham
WA 98229

SEPA Center

Department of Natural Resources

PO Box 47015

Olympia, WA 98504-7015

RE: Lake Whatcom Landscape Plan DEIS

Thank you for this opportunity to comment on the management plan for DNR lands around the Lake Whatcom watershed. I have attended all the public meetings on this subject. I ask you to make these changes to your preferred alternative.

- Formation of an Interjurisdictional Committee to monitor all actions on DNR lands in the watershed. This committee should continuously monitor the slopes and have the power to effect prompt changes.
- A study which scientifically investigated logging on unstable slopes found a very real problem with landslides. Therefore it is imperative that there be no road building on potentially unstable slopes and no harvesting on potentially unstable slopes.
- A true and accurate management plan should be provided by the DNR, not the 200

year average.

- No oil or gas exploration, no diagonal drilling in the watershed.
- Continuous monitoring by the DNR of streams for temperature and sediment because sediment adds to the phosphorous problem in Lake Whatcom and there are already dissolved oxygen problems.
- Larger buffers on all streams
- Exclude all wetlands ^{from logging} and provide buffers on them
- Consider the broad public benefit of the population by ensuring protection from landslides and making certain the slopes generate clean water
- Adoption of a 140 year rotation plan to accomplish the above goals.

Thank you for considering the above points and including them in the final draft.

Sincerely,
Doti Leu

Sepa Center
Department of Natural Resources
PO Box 47015
Olympia, WA 98504-7015

This is a comment on the Lake Whatcom Landscape Plan DEIS.

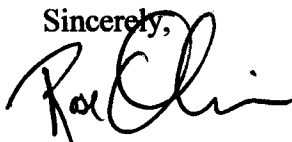
I live in Whatcom County and not only am I one of 87,000 people who drink from the Lake Whatcom reservoir, I also enjoy it for recreation and it's beauty. However the quality of the drinking water and safety of those living below the unstable slopes you manage is at utmost importance to me and my community.

I am asking you to please reconsider your alternatives. After reading the DEIS, I am not pleased with any of the alternatives. There are three issues that I feel were not considered and ought to be.

1. There should be no harvesting or roads built on potentially unstable slopes. The horrific landslide of 1984 has proven that such actions can cause disaster. Not only are lives in danger, but the amount of phosphorous that a landslide would emit into the reservoir could possibly poison our drinking water.
2. There should be a strong Interjurisdictional Committee that oversees all actions on DNR lands in the Lake Whatcom watershed and that has the authority to stop or modify all activities. This committee should not be funded by the local government, but paid for out of the revenues from logging.
3. There should not be any oil or gas exploration, even diagonal drilling, anywhere in the Lake Whatcom watershed.

Please carefully consider my input as well as the other comments you've received from my community. I think you will find that the majority of us agree on these issues and we will stand strong to make sure we have water to drink in the future. Can you blame us?

Sincerely,



Rose Oliver
2216 G St
Bellingham, WA 98225

TO: SEPA CTR / DNR

RE: LK, Whatcom LANDSCAPE PLAN DEIS

The Lake Whatcom LANDSCAPE Plan needs to incorporate the protections in alternative #3 into #2 including no clearcutting on potentially unstable slopes.

Also it is not worth the risk to build roads on steep slopes and then drive heavy equipment on that road. Hydrology is also a concern with people in the watershed receiving their water (drinking) from it.

PAUL HANSEN
419 LAKESIDE DR.
SEDO WOOLLEY WA 98284

SEPA Center
DNR
P.O. Box 47015
Olympia, WA 98504

10/7/3

1136 Soddon Valley
B'ham, W. Va. 28229

DEAR SUE:

I am concerned about slope failure & the water quality of Lake Whetson. I believe that cutting trees on unstable slopes is insane! It would cause unlimited liability to the state if a failure of the slope would cause the damage to property or worse the death of human beings. I believe that a conservative cut must be called for. This includes:

- 1) NO Road Building on unstable slopes
- 2) NO oil & Gas exploration on the watershed
- 3) must monitor the sediment in streams.
- 4) Large Buffers a must for streams & unstable ground.

Lastly, in terms of economic viability a one hundred year old tree is worth much more than a forty year old tree!

Thank you very much

George Gibson

October 6, 2003
1136 Sudden Valley
Bellingham, WA 98226

Seпа Center
Department of Natural Resources
P.O. Box 47105
Olympia, WA 98504-7015

Dear SEPA Center:

Please consider Alternative 3 to keep water clean, prevent landslides, and keep hillsides beautiful for us and future generations. This can be accomplished by no road building on unstable slopes, no gas and oil exploration in the watershed, and monitoring sediments in streams.

Thank you.

Yours truly,

Iris Gibson

IRIS GIBSON

October 6, 2003

To: SEPA Center
Dept of Natural Resources
PO Box 47015
Olympia, WA 98504-7015

RE: Lake Whatcom Landscape Plan DEIS

To whom it may concern:
I live in Glenhaven, or Cain Lake / Lake Samish Watershed. I have witnessed the clear-cutting above my home and was at first disappointed, but later realized that DNR needs to log somewhere to provide the funding for the State and keep up with demand for wood/paper. I assumed that I missed the 'public information meetings.' After more research, I have been disappointed in the ^{lack of} information provided to local residents and with the lack of research provided to ensure the slopes are stable enough to withstand the logging.

I have seen the latest ^{DEIS} plan for my neighborhood and am not satisfied with the information. I would like you to provide a more detailed management plan for the watershed, which spells out the environmental impacts. I would prefer to know that you don't plan to harvest on unstable slopes and work with scientists to figure this out.

Also, I understand you are considering allowing oil or gas explorations in the Lake Whatcom Watershed. I think this is amazing and plead you ~~not~~ to drop this from your plans.

→

Thank you for your consideration of
my input and I look forward to your
response in the way of another
alternative.

Sincerely,

Beth Walsh
3061 Huckleberry Lane
Sedro-Woolley, WA 98284

P.S. On the south end of Lookout Mountain - just west
~~of~~ of the south side of Cabin Lake / Camp 2 road,
there is beautiful old growth. Please do
not log the few trees ~~that~~ have
survived the rest of the logging!

To The Dept. of Natural Resources

I am a concerned citizen of Washington & Whatcom County. The future of our children & their children depends on our actions today. Therefore I am writing to you today to plead with you to consider the impact of logging & the alternatives you have in your decisions. The future of our drinking water is greatly affected by the logging on unstable hill sides, logging too close to streams, logging through wet lands & high density logging (clear cuts). I ask you to provide citizens of Washington with environmental impact statements for watersheds that will be affected. Follow the rules of legislation & keep the citizens of Washington informed of your activities. There are 2 plans you are reviewing in the Whatcom landscape plan DEIS. Plan 3 gives us a more effective way to ensure the future of our drinking water, the future of our ability to manage our lands in a responsible & caring way. The future of our children.

Thank you Robert Smith

10-6-03

To the Department of Natural Resources
RE: Lake Whatcom Landscape Plan DEIS

I am a concerned citizen of Whatcom County living on Cane Lake. Every day I look at the clear cut above Glenhaven and worry about the unstable banks that do not have any trees to hold the top soil. I would like to improve the decision making committee to strongly consider Alternative 3 over alternative 2. I worked on a salmon stream several years ago.

The sediment from clear cuts and run off - not only pollutes the streams and affects wild life but creates a risk of mud slides into our communities.

As the top soil is washed away by rain there is little nutrients left to nourish the saplings planted after a clear cut.

- I realize DNR Funds pay for schools and other public services, however the right thing to do is protect the streams, wet lands and unstable banks by allowing for appropriate buffers 150 feet or more, Not allow Road Building on potentially unstable banks, and leave at least 25% of the trees on every acre logged.

OAS & Oil Drilling should be removed from the preferred alternative

Replanting should occur within one year of cutting trees.

Provisions for monitoring sediment in streams should be included in the logging plan

Glenhaven had a mud/land slide in 1992 or 93
our home owners insurance is at Risk for being
dropped as a result of the last Clear cut!!

The DEIS states only 43 acres will be Clear cut
per year, however the Plan calls for 75 acres of clear cuts
for the first 20 yrs and to increase after that!
Please be truthful to the Citizens in this
County. The exploitation of our natural
resources must be stopped.

We must preserve our lakes, streams, and
habitat for our wild animals.

- No Cutting on unstable Banks
- No Road Building on unstable or
- potentially unstable Banks.
- Wide Buffers for our streams + wetlands
- Replant within one year
- leave 25 % of trees per acre
- No gas or oil Exploration
- Scientific monitoring of sediments in streams.

Please think of future generations of
animals + humans + trees alike
we need each other if we are going
to survive.

Sincerely, Darcy Naughton
3094 Camp 2 Rd.
Sedro Woolley WA
98284

424 Rainbow Drive,
Sedro Woolley,
WA 98284

October 6, 2002.

Sepa Center
Dept. of Natural Resources,
P.O. Box 47015
Olympia, WA 98504

File No. 02-091300

Dear Sirs:

I, along with hundreds of others, appeal to your humane instincts. Please, if you are going to adopt one of the alternatives, make it No 3 when you weigh up the "Risks" please understand those most at risk are the families living directly below the steep slopes you wish to "manage". These people are often unable to move to safer homes, nor can they afford "flood insurance" even if it was available.

Please forget "oil and gas exploration" - not a sensible idea!!

And, please, no more road building, especially on steep slopes. The summer of 2002 was horrible

For those of us residing in Glenhaden. Dynamite reverbates in a valley like a bomb explosion. Added to the sound of falling trees it made for a very scary and depressing time.

On reading the DEIS I find there is no clear explanation of what and how much you intend to "manage" (log?) Please would you rectify this. The public deserves to know what the DNR intends to do with Public Trust land.

Remember, people are much more important than money. You need to listen to them and take their safety into account.

Thank you,

Judith Wilson (Mrs)

P.S. Having signed in at the DNR meet at Glenhaden in July, 2002, we expected to hear of future meetings and ~~action~~ⁱⁿ action. We have heard nothing since - please rectify this also. JW

To: SEPA Center
Department of Natural Resources
PO Box 47015
Olympia, WA 98504-7015

RE: Lake Whatcom Landscape Plan DEIS

Dear DNR,
This letter is in regard to SEPA file
number 02-091300.

Thank you for your efforts to seek citizen
comment on the management plan for DNR
lands around Lake Whatcom. I appreciate
the opportunity to comment on the DEIS.

I live in Whatcom County, Glenhaven
Lakes Club area, on beautiful Reid
Lake. I drink the water from the Lake
Whatcom Reservoir. ~~the~~ We have
very high-quality drinking water and
am concerned about logging in the
area and ask you make changes to
the preferred alternative.

I ask you provide an actual logging
plan. At the workshop on Lake Whatcom
DEIS, DNR staff stated they intend to
log significantly more the first two
decades and ~~was~~ was omitted in the DEIS.
Please correct this oversight.

2

I'm also concerned about logging on unstable slopes. Logic indicates this leads to landslides. I live below the area of intended cuts and believe winter rain will potentially bring down portions of the hillside.

Additionally, the hillside is beautiful, increasing the value of my property when treed. Take away the trees and it isn't very pretty at all.

I understand this is public land. A private timber company will enrich themselves off public land, decreasing the value of my property! Sounds to me like I lose twice.

Because of this, I ask you support the formation of an Interjurisdictional Committee that oversees all action on DNR lands in the watershed, and that has the ability to stop or modify activities. This Committee should not be funded out of the general fund of local governments; it should be paid for out of the revenues from logging.

I also believe there should be monitoring of all streams for sediment and temperature.

(3)

Sediment contributes to a phosphorous problem in the lake and even Basin #3 has dissolved oxygen problems.

This year I caught a three pound Rainbow Trout from Reid Lake. I want to always be able to do that and fear proposed activities will damage the fishes.

Again, please review the DEIS closely. Spell out the true management plan including the logging rate each year.

Now, do not harvest unstable slopes or build roads on unstable ~~slopes~~ slopes which is clearly prohibited by current legislation.

Please convene an Interjurisdictional Committee with independent scientists to stop risky activities on potentially unstable slopes.

Not only do I ask there be no logging, do not permit oil and gas exploration, even using diagonal drilling in the Lake Whittow Waterbed,

Additionally, please monitor activities

4

that will possibly affect streams.

I know this country and state has
a need for timber and its products.
I need clean water. I also moved
into my house with a nice view
of a tree hillside. Please don't
allow this to be taken away from
me, my family, neighbors, and friends.

Sincerely

Carl C. White
3037 Brook Lane
Sedro Woolley 98284
(360) 595-0012

DNR-

10/2/03

You must stop logging on Lookout Mountain -

The deepest part of Reed Lake is only about 12 feet deep now & when the silt washes off of the mountain it will not take long to fill this beautiful lake up & remove it from the landscape.

There have been slides in the area of this logging prior to the logging & the blasting to build the road that already built may have weakened the slopes, a bad condition that is only made worse by the logging. This makes one think how long will it be & how many lives will be lost when the landslides do occur.

There has not been any replanting of new trees yet - which is critical to the stabilization of the slopes.

The lake & streams should be monitored very closely for silt build up.

Do not allow oil or gas drilling on Lake Whatcom or surrounding area.

Cathy Shuler & Jim Bagley
663 Cain Lake Road
Whatcom County

TO: SEPA CENTER

DNR

P.O. Box 47015

OLYMPIA, WA 98504-7015

RE: LAKE WHATCOM (CAIN AND REED)
LANDSCAPE PLAN ~~DE~~ EIS

THANK YOU FOR THE OPPORTUNITY YOU
HAVE ALLOWED FOR ME TO
COMMENT ON THE DEIS.

I SHALL ALSO INCLUDE COMMENTS
ON DAMAGES AND POTENTIAL LIFE
THREATENING DANGER TO FISH AND
HUMAN BEINGS. THAT ~~A~~ ALREADY
ARE BEING IMPACTED BY
CLEAR CUTTING ~~AT~~ AT REED LAKE.

I HAVE ATTENDED SEVERAL MEETINGS
OF CONCERNED CITIZEN INCLUDING
THE MOST RECENT AT SUDREN VALLEY,
OCTOBER, 6, 2003. THERE WERE
45 PEOPLE, OVER HALF OF WHICH
~~ARE~~ HAVE ALREADY BEEN NEGATIVELY
IMPACTED ALONG WITH CONCERNS
OF IMPENDING DANGER AND
CEDIMENTATION OF REED LAKE WITH
MAJOR ENVIRONMENT NEGATIVE IMPACT
ON WATER QUALITY, FISH, AND THE
FUTURE LIFE OF THE LAKE (REED
CAIN)

I AM CONCERN FOR ANY FUTURE
IMPACTS SHOULD MORE CLEARCUTTING
OCCUR IN THE WHATCOM COUNTY
WATERSHED.

THUS, PLEASE CONSIDER CHANGES
TO YOUR "PREFERRED ALTERNATIVE"

① COUNTY MEMBER SHOULD BE PRESENTED
A LOGGING PLAN.

PLEASE CORRECT, AS WAS STATED
AT THE WORKSHOP ON THE LAKE
WHATCOM DECS ~~DECS~~ BY DNR
STAFF THAT DNR INTENDS
TO LOG SIGNIFICANTLY MORE
THEN THE FIRST TWO DECADE
(FINANCIAL ANALYSIS SHOWS 68%
INCREASE FOR FIRST TWO DECADES
OVER NORMAL ANNUAL REVENUES.
THIS WAS NOT MENTIONED IN
PDECS.)

② Preferred Alternative allow logging
on unstable slopes (ARSH#1)
ARSH#1 SLOPES ARE UNSTABLE AND
SHOULD BE BANNED BY THE BILL

NOTE: HOMES ON REED LAKE
WERE DAMAGED IN 82, ~~AND~~ 87
AND, EVEN AS LATE AS
C. 92 PRIOR TO THE
SPRING 2003 CLEARCUT

2 continued.

DNR WOULD BE WELL ADVISED
TO FORM AN INTERJURISDICTIONAL
, COMMITTEE WITH SCIENTIST (INDEPENDENT)
WITH ~~AND~~ ENVIRONMENTAL AND ECOLOGICAL
KNOWLEDGE.

- ③ OIL AND GAS EXPLORATION (Prof. alt).
SHOULD BE IMPOSSIBLE.
- ④ STUDIES SHOULD BE DONE
ON THE ENVIRONMENTAL IMPACT
AND POTENTIAL DANGER TO
CITIZENS AND WILD LIFE
~~AND~~
- ⑤ WATER POLLUTION NEEDS TO
BE ADDRESSED.
- ⑥ STUDYS SHOULD BE CONSIDERED
THAT RELATE TO SEDIMENT INTO
ALL AREN LAKES AS A RESULT
OF LOGGING ROADS, ~~AND~~ CLEARCUTTING,
AND OTHER TIMBER HARVEST
- ⑦ THAT THERE SEEM TO BE
DIFFENT RULES FOR "PRIVATE"
FOREST OWNER SEEMS WRONG AND
~~BEING~~ TO THE EXTENT DNR CAN

ADDRESS THIS OR SOME
LEGISLATIVE ENTITY
COULD BECOME INVOLVED
WOULD BE DESIRABLE.

~~FOR~~ THANK YOU.

— Gary Warmink
DR - Gary Warmink
563 Lakeside Dr
Sedro Woolley,
WA 98284

TO the SEPA Center

10-06-03

I am asking the DNR to spell out their true management plan for logging in the Lake Whatcom watershed, also to evaluate the environmental impacts of that plan to the watershed. Rather than the 200 year average.

Why do you intend to cut 75 acres of clearcuts per year for the first 20 years and 97 acres per year for the next 20 years after that when the DEIS states there will only be 43 acres of clearcuts per year.

I remain concerned about logging on unstable slopes. On page 106 you say there will be no harvest on unstable slopes. Why does the preferred alternative allow logging on ARS #1 unstable slopes. Please do not harvest unstable slopes. Please do not build roads on unstable slopes. The legislation clearly prohibits that.

I ask that environmental experts be brought in the loop on this hole process. I ask that a strong interjurisdictional committee with independent scientists who have authority to stop risky activities on potentially unstable slopes be brought in on the behalf of the people.

10-06-03

I ask that no oil or gas exploration be done in the Lake Whatcom Watershed. This includes diagonal drilling.

Please monitor the impacts of any logging to the streams in the watershed.

I ask that alternative 3 be considered for the sake of the Watershed. Anything less than alternative 3 is a serious threat to our watershed.

Eric Youngman
Er Youngman

56 Sudden Valley
Bellingham, WA 98229

10-6-03

SRPA CENTER
DEPT. OF NATURAL RESOURCES
P.O. Box 47015
OLYMPIA WA 98504-7015

RE: LAKE WHATCOM LANDSCAPE PLAN DELS

- THANKS FOR YOUR EFFORTS TO SEEK PUBLIC COMMENTARY ON THE DNR PLAN FOR LAND MANAGEMENT AROUND LAKE WHATCOM.
- I LIVE IN WHATCOM COUNTY, DRINK THE WATER AND CONTINUE TO BE CONCERNED AROUND THE DECLINE IN WATER PURITY, ESPECIALLY AS IS REFLECTED BY THE DAMAGE TO THE SURROUNDING WATERSHED.
- I WOULD ASK THAT YOU PROVIDE THE CITIZENS OF WHATCOM COUNTY WITH CLEAR & READABLE INFORMATION REGARDING THE ACTUAL ALTERNATIVES TO PLANS FOR LOGGING. IT HAS BECOME CLEAR THAT THE ACTUAL PLANS INCLUDE FAR MORE EXTENSIVE LOGGING THAN ORIGINALLY OUTLINED, ESPECIALLY WITHIN THE FIRST TWO DECADES - PLEASE CORRECT THIS OVERSIGHT AND PROVIDE CLEAR & READABLE INFORMATION REGARDING PLANS FOR THESE LANDS.
- I AM ESPECIALLY CONCERNED WITH LOGGING & ROAD-BUILDING ON UNSTABLE SLOPES, AND AREAS ADJACENT TO HOMES & THE LAKE. DUE TO THE PROBLEMS OF POTENTIAL LANDSLIDES & MUDSLIDES, EXTENSIVE LOGGING IS UNACCEPTABLE. GARBAGE IS ROUTINELY LEFT IN LOGGED AREAS. OUR WATER IS SULLIED. THE STREAMS & LAKE HAVE A SIGNIFICANT REDUCTION IN VIABILITY.

- I WOULD ALSO ASK REGARDING WHO MONITORS SUCH OVER SIGHT COMMITTEES. IT IS IMPERATIVE THAT THOSE SERVING BE ① INDEPENDENT, WITH NO VESTED INTERESTS and ② HAVE CLEAR SCIENTIFIC UNDERSTANDING REGARDING THE IMPACT OF LUMBER HARVESTING ON NATURAL AREAS
- I WILL BE WATCHING FOR A GREATER ACCOUNTABILITY, AS REFLECTED IN ALTERNATIVE 3, WITH GREATER RESTRICTIONS

SINCERELY,

Linda K Logan
919 SODDEN VALLEY
BELLINGHAM WA 98229

10.6.03

SEPA Center,

I am writing on behalf of Lake Whatcom's watershed. I am concerned about the stability of the slopes surrounding Lake Whatcom. I am asking the DNR not to harvest on unstable slopes, or build roads there either.

I am concerned about landslides, flooding, and sedimentary run off affecting the land surrounding mine & my neighbor's homes.

I ask that Alternative 3 be seriously considered for the benefit of our community, wildlife, watershed, and countless other purposes.

I ask for environmental experts to access and determine the stability of Lake Whatcom's watershed. The trees there are a natural barrier against Washington's very wet conditions, and protect the soil from damaging erosion. Experts are needed to definitively measure what level of logging may be done as well as the impact of improper use of these lands.

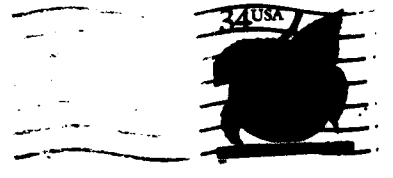
I further ask that provisions be added for the monitoring of sediment in our streams and wetlands after logging is done.

Please spell out your true management plan as well as seriously evaluate the environmental impact of that plan as it would be carried out rather than the 200 year Average.

In closing, for whatever it may count, I would like the DNR to rule against clear cutting in all instances. Selective logging over these large masses of land, leaving at least 25% of current growth, would alleviate many stresses both public + environmental.

Thank You,
Susan Youngman

Susan Youngman
56 Sudden Valley
Bellingham, WA 98229



SEPA center
P.O. Box 47015
Olympia
WA 98504-7015

ATTN: J. Archer SEPA Center Manager



WASHINGTON STATE DEPARTMENT OF
Natural Resources

Please provide your specific comments on the Lake Whatcom Draft EIS:

Went to your meeting 9/22, B'ham.
This only increased the cynicism
of the people. How dare you
talk about risk management
when we are @ risk? Government
for the people when community's
concerns are at the bottom of the
list?
SHAME on you! SHAME

Name: MRS. LINDA SCHELL
Organization: WHATCOM HOME OWNER
Address: 416 Rainbow Drive
Sedro Woolley WA.
(Blanchaven) 98284
E-mail: _____



Please provide your specific comments on the Lake Whatcom Draft EIS:

no clear Cutting Please. I would ^{hope} of preferred
a more restrictive Alternative than
Alternative 3. - which would be more
representative of the community of Glenpark.
I am against the "preferred Alternative".

Name: MR TETTER SCHEI

Organization: Home Owner

Address: 416 Rainbow Drive
Sedro Woolley
WA. 98284

E-mail: _____